

East Suffolk Council - Waveney Local Plan **Statutory 5 year Review Assessment**



March 2024

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Introduction

The East Suffolk Council - Waveney Local Plan was adopted on 20th March 2019. Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 introduced in 2017, states that local planning authorities must review their plans within five years from the date of adoption.

Review in this context means an assessment to determine whether updates to the plan are currently necessary. The National Planning Policy Framework (2023) states that “Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary.”

The Council has completed the review assessment using the Planning Advisory Service (PAS) Toolkit Part 1, supported by an assessment of each policy contained in the Waveney Local Plan.

The review assessment was agreed by Cabinet on 5th March 2024, and concludes that an update is not required at the present time.

PAS Local Plan Route Mapper Toolkit Part 1: Local Plan Review Assessment

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A	PLAN REVIEW FACTORS		
A1.	<p>The plan policies still reflect current national planning policy requirements.</p> <p>PROMPT: As set out above in the introductory text, in providing your answer to this statement consider if the policies in your plan still meet the ‘content’ requirements of the current NPPF, PPG, Written Ministerial Statements and the National Model Design Code (completing Part 2 of the toolkit will help you determine the extent to which the policies in your plan accord with relevant key requirements in national policy).</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence): The policies have been considered in relation to the most recent National Planning Policy Framework (NPPF) (December 2023), as well as changes in the national Planning Practice Guidance (PPG) and Written Ministerial Statements, and other national policy as appropriate including the National Model Design Code.</p> <p>The Waveney Local Plan was prepared and examined under the 2012 NPPF and whilst there have been changes to the policies in the NPPF, the overall aims of the NPPF remain consistent with the Waveney Local Plan. Any relevant areas of change are explained in answering the questions in this matrix, and identified against individual policies in the detailed assessment table at Appendix A where relevant.</p> <p>A key area of change in national policy is the introduction of the standard method for calculating local housing need, which was initially introduced in the 2018 NPPF. However, over this time the local housing need has remained very similar to the housing requirement of 374 dwellings per year contained in the Waveney Local Plan, either slightly above or slightly below (as at 1.2.2024 the housing need calculated under the standard method was 388 dwellings per year). This is considered in more detail under A2 below.</p>
A2.	<p>There has not been a <u>significant</u> change in local housing need numbers from that specified in your plan (accepting there will be some degree of flux).</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p>

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	<p>PROMPT: Look at whether your local housing need figure, using the standard methodology as a starting point, has gone up significantly (with the measure of significance based on a comparison with the housing requirement set out in your adopted local plan).</p> <p>Consider whether your local housing need figure has gone down significantly (with the measure of significance based on a comparison with the housing requirement set out in your adopted local plan). You will need to consider if there is robust evidence to demonstrate that your current housing requirement is deliverable in terms of market capacity or if it supports, for example, growth strategies such as Housing Deals, new strategic infrastructure investment or formal agreements to meet unmet need from neighbouring authority areas.</p>		<p>As stated above, the local housing need has remained very similar to the housing requirement of 374 dwellings per year contained in the Waveney Local Plan, either slightly above or slightly below (as at 1.2.2024 the housing need calculated under the standard method was 388 dwellings per year). The calculations for each year from the adoption of the Local Plan are set out at Appendix B.</p> <p>The Council have consulted the authorities adjoining the Waveney Local Plan area¹ through the Duty to Co-operate and through that ongoing liaison the Council is not aware of any unmet needs at this time. There are no agreements in place to meet any unmet demand from adjoining authorities. The housing requirement of 8,223 dwellings over the plan period includes the part of the Waveney Local Plan area in the Broads (who produce their own Local Plan). The adopted Broads Local Plan identifies a figure of 57 in the Waveney part of the Broads over the whole plan period 2015-2036. This forms part of the objectively assessed need and housing delivered in the Broads will meet this part of the need. The Broads Authority are currently reviewing their Local Plan, however given the relatively small contribution made by housing delivery in the Broads it is not expected that this would lead to any significant effects on meeting the Waveney requirement.</p> <p>There is no evidence to suggest that over the plan period the Local Plan housing requirement is not deliverable. Since the adoption of the Local Plan, housing completions have been rising overall (barring years impacted by Covid). The plan contains an over-allocation of 12% to provide a buffer against some sites not coming forward or coming forward more slowly than anticipated.</p>

¹ The Broads Authority, Great Yarmouth Borough Council, Mid Suffolk District Council, Norfolk County Council, South Norfolk District Council and Suffolk County Council.

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A3.	<p>You have a 5-year supply of housing land</p> <p>PROMPT: Review your 5-year housing land supply in accordance with national guidance including planning practice guidance and the Housing Delivery Test measurement rule book</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The Housing Land Supply as at 31.3.2023² was published in November 2023. This demonstrates there is a 5.62 year supply of deliverable housing land in the Waveney Local Plan area. The latest NPPF and recent changes to the PPG on Housing Supply and Delivery post-date the publication of the Housing Land Supply assessment. The changes introduced the removal of the 5% buffer in the calculations, with the only buffer requirement now being to apply 20% where the latest Housing Delivery Test result is below 85% (this is not the case for East Suffolk). This change would have a positive effect on the land supply figure.</p>
A4.	<p>You are meeting housing delivery targets</p> <p>PROMPT: Use the results of your most recent Housing Delivery Test, and if possible, try and forecast the outcome of future Housing Delivery Test findings. Consider whether these have/are likely to trigger the requirement for the development of an action plan or trigger the presumption in favour of sustainable development. Consider the reasons for this and whether you need to review the site allocations that your plan is reliant upon. In doing so you need to make a judgement as to whether updating your local plan will support</p>	Agree	<p>The toolkit refers to the Government's measure of housing delivery. The most recent result for East Suffolk was 104% (2022 result published in December 2023).</p> <p>Figures for housing delivery in the Waveney Local Plan area are set out below. Whilst the annual requirement of 374 dwellings per year has not been met, it is evident that following the adoption of the plan in 2019 completions have begun to increase in recent years, whilst also recognising that the housing requirement in the current Local Plan is significantly higher than in the previous Local Plan of 290 dwellings per year. Wider matters beyond the Local Plan have had an impact on housing delivery including the Covid pandemic, high inflation, some</p>

² <https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/open-data/housing-land-supply/>

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	<p>delivery or whether there are other actions needed which are not dependent on changes to the local plan.</p>		<p>significant cost increases for (and availability of) materials. Although not necessary as the Housing Delivery Test has been passed, the Council updates its Housing Action Plan each year to identify ways in which the Council can further support the delivery of housing.</p> <p>Housing Delivery since start of Local Plan period to date (number of dwellings):</p> <p>2014/15 – 136 2015/16 – 135 2016/17 – 264 2017/18 – 284 2018/19 – 297 2019/20 – 156 2020/21 – 201 2021/22 – 323 2022/23 – 360</p> <p>There is therefore a total shortfall of 1,210 dwellings against the requirement as at 31.03.2023. Five years following adoption, the plan is still relatively early into its lifetime in terms of delivery (i.e. housing completions resulting from the Plan). Paragraph 1.7 of the Local Plan explains that the level of housing planned for in this plan is significantly higher than the previous plan and represents a significant step change. The plan acknowledges that it will be challenging to remedy the shortfall from the start of the plan period (in 2014) within the first five years following adoption. This position is reflected in the figures above, and is therefore not surprising. Much of the housing in the Plan is expected to come forward on strategic sites including the Beccles and Worlingham Garden Neighbourhood, North of Lowestoft Garden Village, Land South of the Street Carlton Colville, and the Kirkley Waterfront and Sustainable Urban Neighbourhood. As strategic sites, these sites will have relatively long lead in times from adoption of the Plan. The Housing Land Supply Statement sets out the current position</p>

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			<p>in relation to the sites, with some completions anticipated in the next five years. The Council's major sites team provides a dedicated resource to support these sites coming forward. The Council has recently begun the preparation of a planning position statement, including through regular engagement with the landowners, to bring forward delivery of the brownfield Kirkley Waterfront site (the Council is also part-owner of this site). Of the site allocations excluded from the 5 year supply in the Housing Land Supply Statement, in most cases this relates to lack of evidence or an expectation that completions will take place beyond five years and for the most part it is still expected that these sites will come forward in the plan period.</p> <p>The Housing Land Supply Statement identifies 78 dwellings on major sites with full permission excluded from the supply and 70 on small sites with permission excluded. These dwellings may still come forward, however if they don't this is a small proportion of the total requirement and easily accounted for within the buffer.</p> <p>Windfall also makes up part of the future housing supply, on top of the 12% buffer in the local plan, and we have seen an average of 58 windfall completions per year of the type that would be supported by policies in the plan, over the past five years (to 31.3.2023). If that was extrapolated forward, we could forecast that windfalls will provide in the region of an additional 750 dwellings between 2023 and 2036.</p>
A5.	<p>Your plan policies are on track to deliver other plan objectives including any (i) affordable housing targets including requirements for First Homes; and (ii) commercial floorspace/jobs targets over the remaining plan period.</p> <p>PROMPT: Use (or update) your Authority Monitoring Report to assess delivery.</p>	Agree	<p>Affordable housing</p> <p>Policy WLP8.2 of the Waveney Local Plan sets out the following affordable housing requirements:</p> <ul style="list-style-type: none"> • 20% in Lowestoft and Kessingland (excluding Corton) • 40% in Southwold and Reydon • 30% elsewhere <p>Affordable housing is being delivered, as shown in the figures below. The Local Plan acknowledges that to meet the full identified needs for</p>

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			<p>affordable housing of 208 dwellings per year (as evidenced in the Strategic Housing Market Assessment) would not be viable.</p> <p>Housing completions (number of affordable dwellings in brackets):</p> <ul style="list-style-type: none"> • 2014/15 – 136 (24 affordable) • 2015/16 – 135 (13 affordable) • 2016/17 – 264 (88 affordable) • 2017/18 – 284 (120 affordable) • 2018/19 – 297 (89 affordable) • 2019/20 – 156 (25 affordable) • 2020/21 – 201 (42 affordable) • 2021/22 – 323 (111 affordable) • 2022/23 – 360 (42 affordable) <p>26% of all dwellings completed between 2014-23 were affordable housing (554 of 2,156 new homes), demonstrating that affordable housing is being delivered under WLP 8.2. The figure of 26% relates to the proportion of <i>all</i> housing completions, which will include those on sites of 10 or fewer dwellings where affordable housing is not required by policy.</p> <p>Whilst policy WLP8.2 includes provision for the level and tenure of affordable housing to be varied in exceptional circumstances, in reality this part of the policy is only vary rarely applied.</p> <p>Policy WLP8.2 expects 50% of affordable housing provided on a residential sites to be affordable rent, with the policy not specifying a tenure for the remaining 50%. Therefore the First Homes policy requirement of 25% of provision being for First Homes can be delivered within the current policy, as explained in the Affordable Housing Supplementary Planning Document.</p> <p>Commercial development</p>

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			<p>In relation to commercial floorspace, a total of around 10,000sqm has been delivered on allocated sites, albeit there have been losses elsewhere. The Local Plan does not include an annual target for delivery, reflecting the way in which employment land generally comes forward. Further the Local Plan over-allocates land for employment recognising that not all allocated sites may deliver. The employment strategy, focused largely on Lowestoft plus the market towns, remains appropriate. The Lowestoft area is expected to remain the main driver of employment and a focus of regeneration.</p> <p>A significant proportion of the allocated employment land is expected to come forward as part of larger mixed-use sites (such as Garden Neighbourhoods / Villages). Accordingly, this employment land is likely to be realised at a late stage of the plan period. To support the delivery of employment land, the Council is preparing an Employment Land Action Plan (on a similar basis to the Housing Action Plan) which will provide a basis for closely monitoring, and taking action where needed and appropriate, to support employment sites coming forward.</p> <p>Since the adoption of the Local Plan, there have been changes to the Use Classes Order with the introduction of Class E and removal of B1 along with A Class uses. This represents an area of the plan where future updates would be desirable, however the policies can be operated effectively in the meantime for Development Management purposes.</p> <p>In terms of town centre uses, the role of retail is likely to be less dominant in the future in the town centre, and whilst there are no necessary changes needed to the policy as it is broadly performing well and is reflective of the NPPF policy, changes may be desirable in the longer term to reflect economic and social trends.</p>

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A6.	<p>There have been no significant changes in economic conditions which could challenge the delivery of the Plan, including the policy requirements within it.</p> <p>PROMPT: A key employer has shut down or relocated out of the area.</p> <p>Unforeseen events (for example the Covid-19 Pandemic) are impacting upon the delivery of the plan.</p> <p>Up-to-date evidence suggests that jobs growth is likely to be significantly more or less than is currently being planned for.</p> <p>Consider if there is any evidence suggesting that large employment allocations will no longer be required or are no longer likely to be delivered.</p> <p>You will need to consider whether such events impact on assumptions in your adopted local plan which have led to a higher housing requirement than your local housing need assessment indicates.</p> <p>Consider what the consequences could be for your local plan objectives such as the balance of in and out commuting and the resultant impact on proposed transport infrastructure provision (both capacity and viability), air quality or climate change considerations.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>In terms of housing delivery, economic conditions are monitored through the annual updates to the Housing Action Plan. Whilst there have been impacts on the economy from a range of external factors including the Covid pandemic, costs and availability of materials and the cost of living crisis, housing delivery has increased over the last couple of years and there is nothing to suggest that long term delivery of the housing growth set out in the Local Plans will not be achieved.</p> <p>The Local Plan’s employment Strategy focuses largely on delivering growth in Lowestoft as well as Beccles plus the other market towns. This strategy remains appropriate and the Lowestoft area is expected to remain the main driver of employment and a focus of regeneration. A significant proportion of the allocated employment land is expected to come forward as part of comprehensive mixed-use sites. Accordingly, this employment land is likely to be realised at a later stage of the plan period.</p> <p>The objectives for Lowestoft are being broadly met through the Town Centre Masterplan, Cycling and Walking Strategy, London Road Lowestoft High Street Heritage Action Zone, London Road Lowestoft High Street Heritage Action Zone and Seafront Masterplan, Seafront Delivery Project, Towns Fund, and North Lowestoft Heritage Action Zone SPD.</p> <p>In addition, Neighbourhood Plans such as the made Halesworth Neighbourhood Plan provides support to the Local Plan’s employment ambitions.</p> <p>The housing requirement in the Local Plan was not increased above the Objectively Assessed Need to reflect forecast jobs growth – this was</p>

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			<p>assessed in the Strategic Housing Market Assessment and not considered to be necessary.</p> <p>Since adoption of the Plan, a number of Nationally Significant Infrastructure Projects (NSIPs) have been proposed and are coming forwards in the area, many however beyond the Waveney Local Plan area in terms of physical development. Development of the Sizewell C new nuclear power station, in East Suffolk but in the current Suffolk Coastal Local Plan area, has very recently commenced, with much of the associated development also proposed for within the former Suffolk Coastal Local Plan area. A number of off-shore wind energy developments are also coming forward, as anticipated by the Waveney Local Plan – the Local Plan vision and a number of policies plan for the growth of the sector around Lowestoft. Decisions on NSIPs themselves are taken by the Secretary of State and are informed by National Policy Statements which are produced by Government outside of the Local Plan process, and the Local Plan does not therefore need to set the full policy framework for consideration of NSIPs.</p>
A7.	<p>There have been no significant changes affecting viability of planned development.</p> <p>PROMPT: You may wish to look at the Building Cost Information Service (BCIS) All-in Tender Price Index, used for the indexation of Community Infrastructure Levy (CIL), or other relevant indices to get a sense of market changes.</p> <p>Consider evidence from recent planning decisions and appeal decisions to determine whether planning policy requirements, including affordable housing, are generally deliverable.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The Council recently undertook and adopted a review of its Community Infrastructure Levy Charging Schedule. The new rates have been informed by viability evidence which considered the policy requirements of the Local Plan.</p> <p>Policy WLP8.2 Affordable Housing provides for the level and tenure of affordable housing to be varied where it can be satisfactorily demonstrated that a lower level is needed for viability reasons. There have been very few occasions where this or provision of a commuted sum in lieu of provision on site has been agreed.</p>

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	Ongoing consultation and engagement with the development industry may highlight any significant challenges to delivery arising from changes in the economic climate.		The Council regularly engages with the development industry, in particular through its annual Housing Land Supply surveys and also through developer forums. Strategic economic challenges highlighted are considered through the annual Housing Action Plan.
A8.	<p>Key site allocations are delivering, or on course to deliver, in accordance the local plan policies meaning that the delivery of the spatial strategy is not at risk.</p> <p>PROMPT:</p> <p>Identify which sites are central to the delivery of your spatial strategy. Consider if there is evidence to suggest that lack of progress on these sites (individually or collectively) may prejudice the delivery of housing numbers, key infrastructure or other spatial priorities. Sites may be deemed to be key by virtue of their scale, location or type in addition to the role that may have in delivering any associated infrastructure.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The Local Plan allocated land for 6,202 houses (additional to sites with planning permission already as at 1.4.17). Of those, a number now have permission or are being developed, as indicated in the policy assessment table in Appendix A. As mentioned above, the Waveney Local Plan area has a Housing Land Supply of 5.62 years (as published in November 2023) demonstrating that sites are coming forward.</p> <p>The Local Plan contains four strategic sites – Kirkley Waterfront and Sustainable Urban Neighbourhood; North of Lowestoft Garden Village; Beccles and Worlingham Garden Neighbourhood and Land South of the Street, Carlton Colville. The Council’s Major Sites team provides a dedicated resource to facilitate and support these sites in coming forward, such as ongoing liaison in regards to masterplanning. Preparation of a planning position statement for the Kirkley Waterfront and Sustainable Urban Neighbourhood is underway, to provide up to</p>

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			date guidance to support the delivery of this large, brownfield site. Strategic sites were not anticipated to deliver completions in the early part of the plan period, and the current focus on supporting these sites in coming forward under the Local Plan policies remains appropriate.
A9.	<p>There have been no significant changes to the local environmental or heritage context which have implications for the local plan approach or policies.</p> <p>PROMPT: You may wish to review the indicators or monitoring associated with your Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) / Habitats Regulations Assessment (HRA).</p> <p>Identify if there have been any changes in Flood Risk Zones, including as a result of assessing the effects of climate change.</p> <p>Consider whether there have been any changes in air quality which has resulted in the designation of an Air Quality Management Area(s) or which would could result in a likely significant effect on a European designated site which could impact on the ability to deliver housing or employment allocations.</p> <p>Consider whether there have been any changes to Zones of Influence / Impact Risk Zones for European sites and Sites of Special Scientific Interest or new issues in relation to, for example, water quality.</p> <p>Consider whether there have been any new environmental or heritage designations which could impact on the delivery of housing or employment / jobs requirements / targets.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>There have been no changes in relation to international designations (Special Protection Areas and Special Areas of Conservation). The Habitats Regulations Assessment for the Local Plan concluded that the housing development within 13km of some Special Protection Areas and Special Areas for Conservation will cause recreational disturbance. In accordance with the policy, a Recreational disturbance Avoidance and Mitigation Strategy and accompanying Supplementary Planning Document were prepared and a Delivery Manager is being recruited to manage the delivery of the mitigation measures through the partnership agreement with other relevant authorities.</p> <p>A Coastal Adaptation Supplementary Planning Document was adopted in 2023, providing guidance on implementing the coastal change policies in the plan. The underlying data on which the Coastal Change Management Area is based, as set out in the Shoreline Management Plan (SMP), would benefit from being updated (the short-term risk zone (i.e. changes to the coast expected within 20 years) is identified within SMP7 (Lowestoft to Felixstowe) as ending in 2025) but this change is not considered to necessitate review of the policy and is not directly within the control of the Council anyway, as SMPs are prepared on a partnership basis by a number of bodies.</p> <p>There are no designated AQMAs in the Local Plan area.</p>

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	<p>Consider any relevant concerns being raised by statutory consultees in your area in relation to the determination of individual planning applications or planning appeals which may impact upon your plan - either now or in the future.</p>		<p>The Zones of Influence for European sites remain as identified in the Recreational disturbance Avoidance and Mitigation Strategy which is being implemented in accordance with the Local Plan. Amendments to SSSI Impact Risk Zones are considered on a site-by-site basis through the development management system, and consultation with Natural England is carried in accordance with the latest advice.</p> <p>The Waveney Local Plan area is not affected by nutrient neutrality.</p> <p>The local list of parks and gardens has been extended in 2022 to include five historic parklands in the Waveney Local Plan area (it formerly covered the Suffolk Coastal Local Plan area only). The identification of these does not present any issues in relation to the delivery of the Local Plan strategy. Reference to the locally listed parks and gardens would provide clarity in the policy approach for these areas however in the meantime, national policy in paragraph 209 of the NPPF will apply to proposals.</p> <p>There have been changes to the boundaries of some Conservation Areas in the Waveney Local Plan area and reviews of the Conservation Area Appraisals and Management Plans since adoption of the Local Plan, including in North Lowestoft, South Lowestoft, Bungay and Southwold. Paragraph 8.228 recognises that Conservation Area Appraisals and Management Plans are regularly updated. It is not thought that the nature of the revisions would have an impact on the delivery of the Local Plan's housing and employment requirements.</p>
A10.	<p>No new sites have become available since the finalisation of the adopted local plan which require the spatial strategy to be re-evaluated.</p> <p>PROMPT:</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>No significant new sites have become available or been granted permission which would affect the delivery of the Local Plan strategy.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
	<p>Consider if there have been any new sites that have become available, particularly those within public ownership which, if they were to come forward for development, could have an impact on the spatial strategy or could result in loss of employment and would have a significant effect on the quality of place if no new use were found for them.</p> <p>Consider whether any sites which have now become available within your area or neighbouring areas could contribute towards meeting any previously identified unmet needs.</p>		
A11.	<p>Key planned infrastructure projects critical to plan delivery are on track and have not stalled / failed and there are no new major infrastructure programmes with implications for the growth / spatial strategy set out in the plan.</p> <p>PROMPT: You may wish to review your Infrastructure Delivery Plan / Infrastructure Funding Statement, along with any periodic updates, the Capital and Investment programmes of your authority or infrastructure delivery partners and any other tool used to monitor and prioritise the need and delivery of infrastructure to support development.</p> <p>Check if there have been any delays in the delivery of critical infrastructure as a result of other processes such as for the Compulsory Purchase of necessary land.</p> <p>Identify whether any funding announcements or decisions have been made which materially impact upon the delivery of key planned infrastructure, and if so, will this impact upon the delivery of the Local Plan.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>Major infrastructure projects listed in the policy are all well-advanced or completed:</p> <ul style="list-style-type: none"> • Third crossing (Gull Wing bridge) approved and due to complete in early 2024 • Beccles Southern Relief Road completed • A12 improvements being made (Brightwell Lakes, Sizewell-related), MRN bid for Martlesham corridor) <p>Other infrastructure (schools, open space etc) is being secured and delivered as appropriate on a site-related basis, or via CIL funding.</p> <p>A tidal barrier Transport and Works Act Order application was made in October 2023, for the proposed Lowestoft tidal barrier, but work on the whole tidal barrier project was stopped in January 2024 due to insufficient funding. Cessation of the Tidal Barrier project will not directly affect the Local Plan implementation, as the Tidal Barrier project was not sufficiently advanced at the time to specifically be mentioned in the Local Plan.</p>

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			<p>A new East Suffolk Community Infrastructure Levy Charging Schedule was adopted in June 2023, and came into effect on 1st August 2023. This reflects the growth planned and policies in the Local Plan, with CIL rates set accordingly. The Council has a robust CIL Spending Strategy focussed on essential plan-led infrastructure delivery and a rigorous annual Infrastructure Funding Statement process. In a review undertaken by the Planning Advisory Service in 2022, East Suffolk was found to be achieving 'Best Practice' in respect of CIL governance and spending.</p> <p>The Council adopted the Cycling and Walking Strategy in October 2022 and has recently established a cross-party member working group to progress with improvements.</p>

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A12.	<p>All policies in the plan are achievable and effective including for the purpose of decision-making.</p> <p>PROMPT: Consider if these are strategic policies or those, such as Development Management policies, which do not necessarily go to the heart of delivering the Plan’s strategy.</p> <p>Identify if there has been a significant increase in appeals that have been allowed and /or appeals related to a specific policy area that suggest a policy or policies should be reviewed.</p> <p>Consider whether there has been feedback from Development Management colleagues, members of the planning committee, or applicants that policies cannot be effectively applied and / or understood.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>Whilst there are discrete parts of development management policies that would benefit from being updated, for example due to changes in the Use Classes Order, these remain operational and do not affect the overall delivery of the Local Plan strategy. Whilst they may be desirable, updates are not therefore considered necessary.</p> <p>Supplementary Planning Documents have been prepared or updated to assist in the implementation of a number of Development Management policies. These SPDs are:</p> <ul style="list-style-type: none"> • North Lowestoft Heritage Action Zone Design Guide SPD (2020) • Recreational Disturbance and Avoidance Mitigation Strategy SPD (2021) • Historic Environment SPD (2021) • Residential Development Brief for Land North of Union Lane (policy WLP2.14) SPD (2021) • Sustainable Construction SPD (2022) • Affordable Housing SPD (2022) • Housing in Clusters and Small Scale Residential Development in the Countryside SPD (2022) • Coastal Adaptation SPD (2023) <p>Under preparation:</p> <ul style="list-style-type: none"> • Custom and Self Build SPD • Healthy Environments SPD • Rural Development SPD • Preparation of a Planning Position Statement for the Kirkley Waterfront and Sustainable Urban Neighbourhood

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			<p>Appeals performance – 11 out of 13 appeals in the Waveney Local Plan area were dismissed in 2022/23 (85%) indicating the Local Plan is performing well and being upheld in appeals.</p>

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A13.	<p>There are no recent or forthcoming changes to another authority's development plan or planning context which would have a material impact on your plan / planning context for the area covered by your local plan.</p> <p>PROMPT: In making this assessment you may wish to:</p> <ul style="list-style-type: none"> ● Review emerging and adopted neighbouring authority development plans and their planning context. ● Review any emerging and adopted higher level strategic plans including, where relevant, mayoral/ combined authority Spatial Development Strategies e.g. The London Plan. ● Review any relevant neighbourhood plans ● Consider whether any of the matters highlighted in statements A1- A12 for their plan may impact on your plan - discuss this with the relevant authorities. ● Consider any key topic areas or requests that have arisen through Duty to Cooperate or strategic planning discussions with your neighbours or stakeholders - particularly relating to meeting future development and /or infrastructure needs. 	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The Council regularly liaises with authorities adjoining the Waveney Local Plan area (Broads Authority, Great Yarmouth Borough Council, South Norfolk District Council and Mid Suffolk District Council). These authorities are at varying stages in Local Plan preparation. There are no matters identified that would have a material impact on the Plan.</p> <p>The district has good levels of neighbourhood plan activity including made plans; plans under review; and plans being prepared. It is not considered that any of these plans would have a material impact on the Local Plan or the planning context in general.</p> <p>The Waveney Local Plan covers the part of East Suffolk formerly covered by Waveney District. East Suffolk Council was created on 1st April 2019, very shortly after the adoption of the Waveney Local Plan. The Suffolk Coastal Local Plan (covering the southern part of the district) was adopted on 23rd September 2020, and is therefore only around three and a half years into its delivery. It is expected that a future Local Plan would cover the full district (outside of the Broads which is its own planning authority) however in the meantime the two Local Plans provide a framework for plan-led development to come forward.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A14.	<p>There are no local political changes or a revised / new corporate strategy which would require a change to the approach set out in the current plan.</p> <p>PROMPT: In making this assessment you may wish to:</p> <ul style="list-style-type: none"> ● Review any manifesto commitments and review the corporate and business plan. ● Engage with your senior management team and undertake appropriate engagement with senior politicians in your authority. ● Consider other plans or strategies being produced across the Council or by partners which may impact on the appropriateness of your current plan and the strategy that underpins it, for instance, Growth Deals, economic growth plans, local industrial strategies produced by the Local Economic Partnership, housing/ regeneration strategies and so on. 	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>Shortly after adoption of the Local Plan, the Council declared a climate emergency in July 2019.</p> <p>Following the election of the new Administration in May 2023, a new Strategic Plan ‘Our Direction 2028’ has been adopted. This sets out four themes – environmental impact, sustainable housing, tackling inequalities and thriving economy. This assessment has considered the Local Plan in terms of whether the new Strategic Plan requires a change to the approach in the Local Plan.</p> <p>The Local Plan complements the ambitions set out in the Strategic Plan in many respects, including through the provision of affordable housing, delivery of sustainable transport infrastructure, preserving heritage and enhancing biodiversity. The Council seeks to be ambitious in addressing climate change, including through the 2019 Climate Emergency and the new Strategic Plan, and the Local Plan is not inconsistent with this including through policies on, for example, flood risk, sustainable construction and sustainable transport. Through a future review consideration could be given to whether there are further opportunities consistent with national planning policy and other considerations such as viability.</p>

	ASSESSING WHETHER OR NOT TO UPDATE YOUR PLAN POLICIES	YES/NO (please indicate below)	
A15.	You AGREE with <u>all</u> of the statements above	Yes	<p>If no go to question A16.</p> <p>If yes, you have come to the end of the assessment. However, you must be confident that you are able to demonstrate and fully justify that your existing plan policies / planning position clearly meets the requirements in the statements above and that you have evidence to support your position.</p> <p>Based on the answers you have given above please provide clear explanation and justification in section A17 below of why you have concluded that an update is not necessary including references to evidence or data sources that you have referenced above. Remember you are required to publish the decision not to update your local plan policies. In reaching the conclusion that an update is not necessary the explanation and justification for your decision must be clear, intelligible and able to withstand scrutiny.</p>
A16.	You DISAGREE with one or more of the statements above and the issue can be addressed by an update of local plan policies		<p>If yes, based on the above provide a summary of the key reasons <u>why</u> an update to plan policies is necessary in section A17 below and complete Section B below.</p>
A17.	<p><u>Decision:</u> Update plan policies / No need to update plan policies (delete as necessary)</p> <p>Reasons for decision on whether or not to update plan policies (clear evidence and justification will be required where a decision not to update has been reached):</p> <p>As detailed in the responses to questions A1 to A14 above, and further supported by the individual policy screenings set out in Appendix A below, the policies within the East Suffolk Council - Waveney Local Plan remain effective.</p>		

Paragraph 33 of the NPPF refers explicitly to the local housing need figure – “Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future.”

Local housing need, calculated using the Government’s standard methodology, has remained very similar to the housing requirement of 374 dwellings per year contained in the Waveney Local Plan, and as calculated on 1.2.2024 would be 388 dwellings per year.

The Waveney Local Plan area has a 5.62 year supply of deliverable housing land (as published in November 2023) and the latest Housing Delivery Test result for East Suffolk is 104% (2022 result published December 2023). The Local Plan anticipated a significant step change in housing delivery to meet the housing requirement, which is substantially greater than the housing requirement in the former Local Plan of 290 dwellings per year. The Plan acknowledges that it will be challenging to remedy the shortfall from the start of the plan period within the first five years following adoption. Completions have increased in recent years, indicating that delivery is moving in the right direction. The information in the Council’s most recent Housing Land Supply Statement, combined with the fact that a 12% buffer was planned in and that windfall development is providing additional dwellings, provides confidence that the overall housing requirement for the plan period will be achieved.

The assessment shows that, whilst there are some policies where future updates would be desirable, under present circumstances none of these are currently necessary and through the application of planning judgement these policies remain effective and the plan can continue to provide a robust plan-led approach to development.

Other actions that may be required in addition to or in place of an update of plan policies

In addition to the Local Plan, the Council continues to produce additional guidance to support the implementation of planning policies. This includes Supplementary Planning Documents (a number of which are currently in production), strategies and topic specific action plans as detailed in the table at Appendix A in relation to specific policies.

In addition to the ongoing implementation of the Waveney Local Plan, the Council will continue to monitor the delivery of the plan including consideration of future Local Plan review options.

	B. POLICY UPDATE FACTORS	YES/NO (please indicate below)	Provide details explaining your answer in the context of your plan / local authority area
B1	Your policies update is likely to lead to a material change in the housing requirement which in turn has implications for other plan requirements / the overall evidence base.	N/A	N/A
B2	The growth strategy and / or spatial distribution of growth set out in the current plan is not fit for purpose and your policies update is likely to involve a change to this.	N/A	N/A
B3	Your policies update is likely to affect more than a single strategic site or one or more strategic policies that will have consequential impacts on other policies of the plan.	N/A	N/A
	You have answered yes to one or more questions above.	N/A	You are likely to need to undertake a full update of your spatial strategy and strategic policies (and potentially non-strategic policies). Use your responses above to complete Section B4.
	You have said no to <u>all</u> questions (B1 to B3) above	N/A	If you are confident that the update can be undertaken without impacting on your spatial strategy and other elements of the Plan, you are likely to only need to undertake a partial update of policies. Complete Section B4 to indicate the specific parts / policies of the plan that are likely to require updating based on the answers you have given above.
B4	Decision: Full Update of Plan Policies/ Partial Update of Plan Policies (delete as necessary) Reasons for scope of review: N/A		

Date of assessment:	February 2024
Assessed by:	Planning Policy and Delivery Team
Checked by:	Andrea McMillan – Planning Manager (Policy, Delivery and Specialist Services)
Comments:	

Appendix A – East Suffolk Council- Waveney Local Plan Review Screening

In addition to the PAS template, all policies (and the vision and objectives) within the East Suffolk Council - Waveney Local Plan have been individually screened to make an assessment of their ongoing effectiveness. This includes consideration of the following:

Changed circumstances: including new East Suffolk strategies adopted since the Local Plan, new evidence, new designations and delivered infrastructure.

Appeal information: brief summary of relevant appeal decisions.

NPPF or other national policy change implications: brief summary of relevant changes in the National Planning Policy Framework and/ or Planning Practice Guidance. This has considered the most recent NPPF changes, published in December 2023.

Changes to legislation, including PD/Use Class Order changes: brief summary of relevant changes to legislation since adoption of the Waveney Local Plan. This includes changes to permitted development rights and the Use Classes Order which are particularly relevant in relation to retail and employment uses. As part of the screening, consideration has also been given the Levelling up and Regeneration Act 2023 although, for the most part, the implications of this cannot be taken into account until full commencement of the Act along with secondary legislation.

The consideration of these aspects has then fed into a conclusion of the overall effectiveness of the policy.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
Vision	New Strategic Plan 'Our Direction 2028' adopted by Council in November 2023. This contains the theme 'Thriving Economy' which includes ensuring 'local plans work for local people',	No.	As a high-level vision, no implications from changes to the NPPF since adoption of the plan. Specific amendments to the NPPF are considered against relevant policies below.	Range of legislation changes covered under specific topics. Environment Act 2021 – brings in mandatory Biodiversity Net Gain from February 2024.	The vision covers the relevant topics and is broadly aligned with more recently adopted strategies, including the Council's new Strategic Plan. The Council seeks to be ambitious in addressing climate change, including through the 2019 Climate Emergency and the new Strategic Plan, and whilst the Local Plan is not inconsistent with this through a future review consideration could be given to whether there are further opportunities consistent with national planning policy and other considerations such as viability.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	<p>as well as other themes covering Environmental Impact, Sustainable Housing and Tackling Inequalities, which are considered in relation to the specific policies throughout the assessment.</p> <p>Climate Emergency declared by East Suffolk Council in July 2019.</p> <p>East Suffolk Economic Strategy adopted in 2022 – Lowestoft identified as an</p>			<p>Changes to the Use Classes Order and Permitted Development rights are considered in relation to relevant policies.</p>	<p>The place specific elements of the Vision are realised through implementation of relevant policies for those places.</p> <p>As the Local Plan policies reflect the vision, the analysis of policies below are also relevant to consideration of the vision.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	<p>area of focus in the former Waveney area. The Visitor Economy Strategy (2022 – 2027) and Clean Hydrogen Strategy (2023 – 2028) also adopted.</p> <p>The Housing Development Strategy (2020 – 2024) and Housing Enabling Strategy (2020 – 2025) have been published since the Local Plan was adopted.</p> <p>Climate Action Framework adopted March 2023.</p>				
Strategic Priorities and Objectives	New Strategic Plan 'Our Direction 2028'	No.	As high level priorities, there are no	Range of legislation changes covered	The Strategic Priorities and Objectives cover the relevant topics and are broadly consistent with more recently adopted strategies, including the

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	<p>adopted by Council in November 2023.</p> <p>Climate Emergency declared by East Suffolk Council in July 2019.</p> <p>Other strategies as referenced in the row above on the Vision.</p>		<p>implications from changes to the NPPF since adoption of the plan</p>	<p>under specific topics.</p> <p>Environment Act 2021 – brings in mandatory Biodiversity Net Gain from February 2024.</p> <p>Changes to the Use Classes Order and Permitted Development rights are considered in relation to relevant policies.</p>	<p>Council’s new Strategic Plan. The Council seeks to be ambitious in addressing climate change, including through the 2019 Climate Emergency and the new Strategic Plan, and whilst the Local Plan is not inconsistent with this through a future review consideration could be given to whether there are further opportunities consistent with national planning policy and other considerations such as viability.</p> <p>As the Local Plan policies reflect the strategic priorities, the analysis of policies below are also relevant to consideration of the priorities.</p>
WLP1.1 Scale and Location of Growth	<p>New Strategic Plan ‘Our Direction 2028’ adopted by Council in November 2023. This contains the theme ‘Thriving Economy’ which includes ensuring ‘local plans work for local people’</p>	<p>7 dismissed, 3 upheld.</p> <p>Many appeals where WLP1.1 is referenced relate to relatively small scale development and the decisions reinforce the</p>	<p>The housing requirement of 374 dwellings per annum is based on Objectively Assessed Need (assessed in the Strategic Housing Market Assessment) rather than the Government’s</p>	<p>Policy reference to Use Class B1, B2 and B8 out of date following the changes to the Use Class Order in 2020. Use Classes A and B1 now fall within Use Class E.</p>	<p>The housing requirement remains similar to the housing need calculated under the current PPG for Housing and Economic Needs Assessment. As at 1.2.2024 this is 388 dwellings per year. This is not considered to be a significant change in housing need in the context of Paragraph 33 of the NPPF.</p> <p>A five year supply of housing land can be demonstrated for the Waveney Local Plan area. The latest annual update to the Housing Land Supply was published in November 2023 and</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	<p>and the theme 'reduce health inequality and improve wellbeing' which includes ensuring residents have access to services.</p> <p>Climate Emergency declared by East Suffolk Council in July 2019.</p> <p>East Suffolk Economic Strategy adopted in 2022 – Lowestoft identified as an area of focus in the former Waveney area. Visitor Economy Strategy and Clean Hydrogen Strategy also adopted.</p>	<p>strategy of the plan overall.</p> <p>Decisions that relate primarily to other specific policies in the Local Plan are covered against those policies. An appeal was allowed in Halesworth in 2023 (Land West of Norwich Road, APP/X3540/W/22/3301868) for 80 Assisted Living Units and within his report the Inspector considered that the resultant shift of growth in Halesworth from 8% to 9% would not be unacceptable.</p>	<p>standard method, as the WLP was prepared and adopted under the 2012 NPPF. However, the standard method housing need figure has remained very similar to the housing requirement since adoption – as at 1.2.2024 the standard method figure is 388 dpa, as calculated under the current Planning Practice Guidance on Housing and Economic Needs Assessments.</p>		<p>shows a supply of 5.62 years as at 31st March 2023.</p> <p>The most recent Housing Delivery Test result for East Suffolk was 104% (published December 2023).</p> <p>Whilst actual housing completions each year have been below the annual requirement of 374, this has been rising and was close to 374 (at 360) in 2022/23. The Local Plan anticipated that it would be challenging to address the shortfall from earlier in the plan period within the first five years following adoption and recognises that the housing requirement of 374 per year is a significant step change from the requirement of 290 per year in the previous local plan.</p> <p>The Local Plan over-allocates for housing development by 12%, to provide flexibility should some sites not come forward or be delayed. Much of the housing planned is to come forward on strategic sites that were not anticipated to deliver early in the plan period. Windfall development, averaging 58 completions per year over the past five years for the sorts of development that would be supported by the Local Plan policies, will also provide additional completions over the plan period. There is</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	<p>New Water Resource Management Plans are being prepared by Essex and Suffolk Water and Anglian Water. Whilst a moratorium is proposed on new employment development in the Hartismere Water Resource Zone (in E&SW area) until new supply solutions are delivered, this is largely outside of East Suffolk other than a very marginal area, albeit that supply is challenging across other areas.</p>				<p>therefore confidence that the overall requirement for the plan period will be delivered.</p> <p>The Local Plan's employment Strategy, focused largely on delivering growth in Lowestoft as well as Beccles plus the other market towns. This strategy remains appropriate and the Lowestoft area is expected to remain the main driver of employment and a focus of regeneration. A significant proportion of the allocated employment land is expected to come forward as part of comprehensive mixed-use sites. Accordingly, this employment land is likely to be realised at a late stage of the plan period.</p> <p>The policy aims to create 5,000 additional jobs, but job creation is difficult to monitor compared to floor area. Therefore, completion of floorspace is monitored, demonstrating that a total of 10,024 sqm has come forward since the adoption of the plan within allocated site (Policy WLP3.3 Benacre, Road, Ellough) and protected employment areas. However outside of the protected areas there has been a loss meaning there has to date been a net loss of floorspace. It is anticipated that many of the allocated sites (particularly those that are part of a larger strategic site) will deliver later in the plan period. The Council is producing an Employment Action Plan to consider ways in which the delivery of the</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	<p>The role of retail in town centres will likely be less dominant in the future. Potential alterations to the town centre policies to reflect national and local trends may result in the demand and expected growth in this sector to be reduced.</p> <p>Furthermore, the proportion of retail and leisure development directed to Lowestoft could also change.</p>				<p>allocated sites could be further supported. The Local Plan over-allocates land for employment development, on the basis that not all sites may deliver.</p> <p>A future review of the Local Plan would consider the appropriateness of the location of town centre boundaries and the approach to new uses within them.</p> <p>There are no necessary changes needed to the policy as it is broadly performing well, but changes may be desirable in the longer term to reflect economic and social trends. The situation regarding water supply will also continue to be monitored through engagement with the water companies.</p> <p>The policy continues to effectively set the overall strategy for the Plan.</p>
WLP1.2 Settlement Boundaries	None.	Policy generally upheld: 10 dismissed, 2 allowed.	None.	None.	Amending the policy to include C2 uses would be desirable but is not necessary, as other policies also form part of the consideration of applications for C2 uses in countryside locations, including WLP8.21 Sustainable Transport and WLP8.35 Landscape Character. Potential

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
		<p>APP/X3540/W/19/3232531 (Hill Farm Cottage Englishes Lane, Ilketshall St John, Beccles, Suffolk) – Allowed on the basis that any harm would be outweighed by benefits of bringing a redundant building back into use. WLP8.11 (Conversion of redundant rural buildings in the Countryside to residential use) considered too restrictive compared to the NPPF.</p> <p>APP/X3540/W/22/3301868 (Land West Of Norwich Road Halesworth</p>			<p>amendment identified but policy remains effective for C3 and C4 development, and there are other policies in the Plan that would relate to applications for C2 uses (such as policies on sustainable transport and landscape).</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
		Suffolk) development for 80 Assisted Living Units allowed with conditions – Inspector interpreted WLP1.2 to allow for C2 development in the Countryside due to the closed list in footnote 1 for residential uses which refers to only C3 and C4.			
WLP1.3 Infrastructure	New Strategic Plan ‘Our Direction 2028’ adopted by Council in November 2023. This contains the theme ‘reduce health inequality and improve wellbeing’ which includes ensuring residents have	No.	The December 2023 NPPF refers to the delivery of infrastructure as a part of sustainable development (Paragraph 7)	The Levelling Up and Regeneration Act introduces the Infrastructure Levy. The Infrastructure Levy will have an effect (if/when enabled), however this is not expected in the short term.	<p>No fundamental changes, although new infrastructure related to Sizewell C (and possibly rail improvements and other schemes) could be mentioned if the Local Plan is updated.</p> <p>East Suffolk CIL Charging Schedule (adopted in 2023) was tested at Examination and supports the implementation of the adopted Local Plan.</p> <p>Cessation of the Tidal Barrier project will not directly affect the Local Plan implementation, as the Tidal Barrier project was not sufficiently</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	<p>access to services.'</p> <p>Major infrastructure projects listed in the policy are all well-advanced or completed:</p> <ul style="list-style-type: none"> • Third crossing (Gull Wing bridge) approved and due to complete in early 2024. • Tidal barrier TWAO application made in Oct 2023 but work on the whole tidal barrier project was stopped in January 2024 due to insufficient funding. 				<p>advanced at the time to specifically be mentioned in the Local Plan.</p> <p>Policy remains effective.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	<ul style="list-style-type: none"> • Beccles Southern Relief Road completed. • A12 improvements being made (Brightwell Lakes, Sizewell-related), MRN bid for Martlesham corridor. <p>Other infrastructure (schools, open space etc) secured and delivered as appropriate on a site-related basis, or via CIL funding to SCC.</p> <p>East Suffolk CIL Charging Schedule adopted 2023 - reflects the growth</p>				

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	planned and policies in the Local Plan.				
WLP 2.1 Central and Coastal Lowestoft Regeneration	<p>Lowestoft Town Centre Masterplan published by East Suffolk Council in 2020 (Regeneration led masterplan).</p> <p>Gull Wing bridge due for completion in early 2024.</p> <p>Tidal barrier Transport Works Act Order (TWAO) application made in Oct 2023 but work on the whole tidal barrier project was stopped in January 2024 due to insufficient funding.</p>	No	None.	Introduction of Use Class E and other Permitted Development measures, (like office to residential and retail to residential conversion) which reduce the effective degree of control over town centre regeneration schemes.	<p>Objectives are being broadly met through means such as the Town Centre Masterplan, Cycling and Walking Strategy, Seafront Delivery Project, Towns Fund, and North Lowestoft Heritage Action Zone SPD.</p> <p>Cessation of the Tidal Barrier project will not directly affect the Local Plan implementation, as the Tidal Barrier project was not sufficiently advanced at the time to specifically mentioned in the Local Plan.</p> <p>Policy remains effective.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
WLP 2.2 PowerPark	<p>Nexus scheme (re-development of ESC buildings for clean energy users under application DC/22/4533/FUL) is now under construction. Conrad Energy scheme (DC/21/5329/FUL) nr Gulliver also permitted.</p> <p>Scores project has improved connectivity to East of England Park.</p> <p>Lowestoft Town Centre Masterplan published by East Suffolk Council in 2020 (Regeneration led masterplan)</p>	No.	None.	B1 use class no longer exists and has become part of Use Class E(g) in the 2020 amendments to the Use Classes Order.	Changes to the Use Classes Order means that updating references to B1 uses in the policy would be desirable, but this change is not considered currently necessary as decisions can be taken with reference to the new Use Classes Order.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
WLP 2.3 Peto Square	<p>Lowestoft Town Centre Masterplan published by East Suffolk Council in 2020. (Regeneration led masterplan)</p> <p>Gull Wing bridge due for completion in early 2024.</p> <p>Tidal barrier TWAO application made in Oct 2023 but work on the whole tidal barrier project was stopped in January 2024 due to insufficient funding.</p>	No.	None.	A1, A3, A4 and D1 Use Class no longer exists and has become part of Use Class E(g) in the 2020 amendment to the Use Classes Order.	<p>Changes to the Use Classes Order means that updating references to A and D uses in the policy would be desirable, but this change is not considered currently necessary as decisions can be taken with reference to the new Use Classes Order.</p> <p>Cessation of the Tidal Barrier project will not directly affect the Local Plan implementation, as the Tidal Barrier project was not sufficiently advanced at the time to be specifically mentioned in the Local Plan.</p> <p>Amending the policy would be desirable but is not necessary</p>
WLP2.4 Kirkley Waterfront and Sustainable Urban Neighbourhood	Gull Wing bridge due for completion in early 2024.	No.	None.	B1 use class no longer exists and has become part of Use Class E(g) in the 2020	Changes to the Use Classes Order means that updating references to B1 uses in the policy would be desirable, but this change is not considered currently necessary as decisions can

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	<p>Tidal barrier TWAO application made in Oct 2023 but work on the whole tidal barrier project was stopped in January 2024 due to insufficient funding.</p> <p>The emerging Lowestoft Neighbourhood Plan includes a policy on this site.</p> <p>East Suffolk Council's Strategic Plan is set out in Our Direction 2028. This includes a theme 'to promote housing developments which enhance wellbeing and protect the</p>			<p>amendment to the Use Classes Order.</p>	<p>be taken with reference to the new Use Classes Order.</p> <p>Cessation of the Tidal Barrier project will not directly affect the Local Plan implementation, as the Tidal Barrier project was not sufficiently advanced at the time to specifically mentioned in the Local Plan.</p> <p>Emerging preparation of Planning Position Statement for the Kirkley Waterfront and Sustainable Urban Neighbourhood will further support delivery of the site.</p> <p>Amending the policy would be desirable but is not necessary</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	environment.’ This refers to using master planning to engage with our residents.				
WLP 2.5 East of England Park	None.	No.	None.	None.	A significant number of the criteria within the policy have been delivered excluding a café and art work/sculpture, but these may be provided in the future. Policy remains effective.
WLP 2.6 Western End of Lake Lothing	Some small-scale development has taken place (e.g. on Lake View Terrace). Tidal barrier TWAO application made in Oct 2023 but work on the whole tidal barrier project was stopped in January 2024 due to insufficient funding.	No.	None.	None.	Cessation of the Tidal Barrier project will not directly affect the Local Plan implementation, as the Tidal Barrier project was not sufficiently advanced at the time to specifically mentioned in the Local Plan. Policy remains effective.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
WLP 2.7 Former Battery Green Car Park	Lowestoft Town Centre Masterplan published by East Suffolk Council in 2020. (Regeneration led masterplan)	No.	None.	A1, A2, A3, A4 and D2 Use Class no longer exists and has become part of Use Class E in the 2020 amendment to the Use Classes Order.	Changes to the Use Classes Order means that updating references to A and D uses in the policy would be desirable, but this change is not considered currently necessary as decisions can be taken with reference to the new Use Classes Order. Amending the policy would be desirable but is not necessary
WLP 2.8 Former Lowestoft Hospital	DC/21/5015/FUL permission granted for 6 x 2 bed dwellings and demolition of existing building.	No.	None	None.	The 2023 Housing Land Supply identifies that delivery is being hindered by an overage clause. Whilst it is not expected that delivery will take place in the short term, the redevelopment of this brownfield site remains an important policy and is being considered through the Housing Action Plan. Policy remains effective as part of the strategy to meet housing requirements.
WLP 2.9 Historic High Street and Scores Area	North Lowestoft Heritage Action Zone Design Guide published in 2020 provides detailed guidance for this area. Lowestoft Town Centre Masterplan	No.	None.	Introduction of Use Class E in the 2020 amendments to the Use Classes Order means that there is less control about the range of uses within a town or district centre.	Changes to the Use Classes Order means that updating references to A class uses in the policy would be desirable, but this change is not considered currently necessary as decisions can be taken with reference to the new Use Classes Order. Policy requirement for a Design Guide has been fulfilled through the adoption of the North Lowestoft Heritage Action Zone Design Guide

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	published by the Council in 2020 (Regeneration led masterplan).				Supplementary Planning Document in July 2020, and will continue to provide guidance on implementing the policy. Policy remains effective.
WLP 2.10 Inner Harbour Port Area	Lowestoft Town Centre Masterplan published by the Council in 2020 (Regeneration led masterplan). Gull Wing bridge due for completion in early 2024.	No.	None.	None.	Policy remains effective.
WLP 2.11 Oulton Broad District Shopping Centre	None.	No.	None	A1, A2, A3, A4, A5, D2 and B1a Use Classes no longer exist and have become part of Use Class E(g) in the 2020 amendment to the Use Classes Order.	The introduction of Use Class E means that there is less control about the range of uses within a town or district centre. Changes to the Use Classes Order means that updating references to A, B and D class uses in the policy would be desirable, but this change is not considered currently necessary as decisions can be taken with reference to the new Use Classes Order. Amending the policy would be desirable but is not necessary

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
WLP 2.12 Kirkley District Shopping Centre	None.	No.	None	A1, A2, A3, A4, A5, D2 and B1a Use Classes no longer exist and have become part of Use Class E(g) in the 2020 amendment to the Use Classes Order.	The introduction of Use Class E means that there is less control about the range of uses within a town or district centre. Changes to the Use Classes Order means that updating references to B1 uses in the policy would be desirable, but this change is not considered currently necessary as decisions can be taken with reference to the new Use Classes Order. Amending the policy would be desirable but is not necessary
WLP 2.13 North of Lowestoft Garden Village	Pre-application discussions are continuing, with some public pre-app consultation in 2022. Emerging Corton Neighbourhood Plan is in its early stages.	No.	None.	B1 Use Class no longer exists and has become part of Use Class E(g) in the 2020 amendment to the Use Classes Order.	Developer engagement ongoing. No indication that the site won't be delivered in the Local Plan period. Changes to the Use Classes Order means that updating references to B1 uses in the policy would be desirable, but this change is not considered currently necessary as decisions can be taken with reference to the new Use Classes Order. Amending the policy would be desirable but is not necessary
WLP 2.14 Land North of Union Lane, Oulton	Residential development brief for the site	No.	None.	None.	Development brief in place and developer engagement ongoing. No indication that the site won't be delivered in the Local Plan period.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	<p>adopted by East Suffolk Council in September 2021, as a Supplementary Planning Document.</p> <p>DC/22/4993/FUL Hybrid app for outline for 87 dwellings and full for 45 awaiting decision.</p>				<p>Policy remains effective as part of the strategy to meet housing requirements.</p>
WLP 2.15 Land Between Hall Lane and Union Lane, Oulton	DC/23/3191/FUL - Outline application for 163 dwellings and full application for 34 dwellings awaiting decision.	No.	None.	None.	<p>Developer engagement ongoing. No indication that the site won't be delivered in the Local Plan period.</p> <p>Policy remains effective as part of the strategy to meet housing requirements.</p>
WLP 2.16 Land South of The Street, Carlton Colville/ Gisleham	None.	No.	None	None.	<p>Allocation undeveloped but there is no indication that the site won't be delivered in the Local Plan period.</p> <p>Policy remains effective as part of the strategy to meet housing requirements.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
WLP 2.17 Land at South Lowestoft Industrial Estate	None.	No.	None	B1 Use Class no longer exists and has become part of Use Class E(g) in the 2020 amendment to the Use Classes Order.	Allocation undeveloped but there is no indication that the site won't be delivered in the Local Plan period. Changes to the Use Classes Order means that updating references to B1 uses in the policy would be desirable, but this change is not considered currently necessary as decisions can be taken with reference to the new Use Classes Order. Amending the policy would be desirable but is not necessary
WLP 2.18 Land at Mobbs Way, Oulton	None.	No.	None.	B1 Use Class no longer exists and has become part of Use Class E(g) in the 2020 amendment to the Use Classes Order.	Allocation undeveloped but there no indication that the site won't be delivered in the Local Plan period. Changes to the Use Classes Order means that updating references to B1 uses in the policy would be desirable, but this change is not considered currently necessary as decisions can be taken with reference to the new Use Classes Order.. Amending the policy would be desirable but is not necessary
WLP 2.19 Oakes Farm, Beccles Road Carlton Colville	None.	No.	None.	None.	Allocation undeveloped, but developer engagement is ongoing, and there is no indication that the site won't be delivered in the Local Plan period.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
					Policy remains effective.
WLP 2.20 Gunton Park, off Old Lane, Corton	None.	No.	None.	None.	Allocation undeveloped but there is no indication that the site won't be delivered in the Local Plan period. Policy remains effective as part of the strategy to meet housing requirements.
WLP 3.1 Beccles and Worlingham Garden Neighbourhood	None.	No.	None.	B1 use class no longer exists and has become part of Use Class E(g) in the 2020 amendments to the Use Classes Order.	Allocation undeveloped, but developer engagement is ongoing, with no indication that the site won't be delivered in the Local Plan period. Changes to the Use Classes Order means that updating references to B1 uses in the policy would be desirable, but this change is not considered currently necessary as decisions can be taken with reference to the new Use Classes Order. Updates identified but policy remains effective as part of the strategy to meet housing requirements.
WLP 3.2 Land West of London Road, Beccles	DC/21/0671/FUL & DC/18/4312/FUL permitted for 241 dwellings and associated uses.	No.	None	None.	Site delivery is ongoing, with no indication that the site won't be delivered in the Local Plan period. Policy remains effective as part of the strategy to meet housing requirements.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
WLP 3.3 Land South of Benacre Road at Ellough Airfield, Ellough	None.	No.	None	B1 Use Class no longer exists and has become part of Use Class E(g) in the 2020 amendments to the Use Classes Order.	<p>Allocation remains partially undeveloped with no indication that the site won't be delivered in the Local Plan period. Some development has taken place on the site.</p> <p>Changes to the Use Classes Order means that updating references to B1 uses in the policy would be desirable, but this change is not considered currently necessary as decisions can be taken with reference to the new Use Classes Order.</p> <p>Amending the policy would be desirable but is not necessary</p>
WLP 4.1 Halesworth/Holton Healthy Neighbourhood	<p>Application DC/21/0007/FUL for sport facilities permitted.</p> <p>DC/21/0027/FUL for a retirement community permitted.</p> <p>DC/18/4947/OUT for 190 dwellings permitted.</p>	No.	None.	None.	<p>Site delivery is ongoing, and there is no indication that the site won't be delivered in the Local Plan period.</p> <p>Policy remains effective as part of the strategy to meet housing requirements.</p>
WLP 4.2 Land Adjacent to Chediston Street, Halesworth	DC/21/5669/ARM permitted for 161 dwellings.	No.	None.	None.	<p>Site delivery is ongoing, and there is no indication that the site won't be delivered in the Local Plan period.</p> <p>Policy remains effective as part of the strategy to meet housing requirements.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
WLP 4.3 Land North of Old Station Road, Halesworth	None	No.	None.	None.	Allocation undeveloped but there is no indication that the site won't be delivered in the Local Plan period. Policy remains effective as part of the strategy to meet housing requirements.
WLP 4.4 Land West of Lodge Road, Holton	DC/20/3070/FUL for 15 dwellings permitted.	No.	None.	None.	Allocation has permission and is under construction. There is no indication that the site won't be delivered in the Local Plan period. Policy remains effective as part of the strategy to meet housing requirements.
WLP 4.5 Land at Dairy Farm, Saxons Way, Halesworth	DC/21/4501/FUL hybrid permission for retirement living accommodation and community building.	No.	None.	None.	Site delivery is ongoing, with no indication that the site won't be delivered in the Local Plan period. Policy remains effective as part of the strategy to meet housing requirements.
WLP 4.6 Broadway Farm, West of Norwich Road, Halesworth	None.	No.	None.	B1 use class no longer exists and has become part of use class E(g) in the 2020 amendment to the Use Classes Order.	Allocation undeveloped. Changes to the Use Classes Order means that updating references to B1 uses in the policy would be desirable, but this change is not considered currently necessary as decisions can be taken with reference to the new Use Classes Order. Amending the policy would be desirable but is not necessary
WLP 5.1 Land East of St Johns Road, Bungay	None.	No.	None.	None.	Allocation undeveloped but no indication that the site won't be delivered in the Local Plan period.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
					Policy remains effective as part of the strategy to meet housing requirements.
WLP 5.2 Land West of St Johns Road, Bungay	DC/18/4429/ARM for 150 dwellings permitted.	No.	None.	B1 use class no longer exists and has become part of use class E(g) in the 2020 amendment to the Use Classes Order.	Site delivery is ongoing, with no indication that the site won't be delivered in the Local Plan period. Amending the policy would be desirable but is not necessary
WLP 6.1 Land West of Copperwheat Avenue, Reydon	DC/19/1141/OUT for 220 dwelling permitted.	No.	None.	None.	Site has permission, with no indication that the site won't be delivered in the Local Plan period. Policy remains effective as part of the strategy to meet housing requirements.
WLP 6.2 Southwold Harbour	Policy refers to Suffolk Coast and Heaths Area of Outstanding Natural Beauty which is now known as National Landscapes (albeit AONB remains the statutory title).	No.	None.	None.	It would be desirable to update the reference to the AONB and Southwold Harbour Conservation Area but these are minor changes that are not considered to warrant review of the policy. Amending the policy would be desirable but is not necessary.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	The former Southwold Harbour conservation Area in this location is now part of the Southwold Conservation Area.				
WLP 7.1 Rural Settlement Hierarchy and Housing Growth	None.	Policy largely upheld on appeal – 6 appeals dismissed and 1 allowed with conditions.	None.	None.	No change required. Policy remains effective.
WLP7.2 Land Between The Street and A146, Barnby	None.	No.	None	None	Allocation undeveloped but with no indication that the site won't be delivered in the Local Plan period. Policy remains effective as part of the strategy to meet housing requirements.
WLP7.3 Land South of Lound Road, Blundeston	None.	No.	None	None	Allocation undeveloped but with no indication that the site won't be delivered in the Local Plan period. Policy remains effective as part of the strategy to meet housing requirements.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
WLP7.4 Land North of Pickwick Drive, Blundeston	None.	No.	None	None	Allocation remains undeveloped with no indication that the site won't be delivered in the Local Plan period. Policy remains effective as part of the strategy to meet housing requirements.
WLP7.5 – Land North of The Street, Somerleyton	DC/21/3593/FUL permitted for 9 dwellings.	No.	None	None	Site has planning permission and there is no indication that the site won't be delivered in the Local Plan period. Policy remains effective as part of the strategy to meet housing requirements.
WLP7.6 – Mill Farm Field, Somerleyton	DC/21/4745/FUL permitted for 35 dwellings and open space.	No.	None	None	Site has planning permission and there is no indication that the site won't be delivered in the Local Plan period. Policy remains effective as part of the strategy to meet housing requirements.
WLP7.7 – Land North of Elms Lane, Wangford	Policy refers to Suffolk Coast and Heaths Area of Outstanding Natural Beauty which is now known as National Landscapes (albeit AONB	No.	None	The Levelling Up and Regeneration Act has amended the duty on public bodies in relation to AONBs (National Landscapes) requiring that bodies must seek to 'further the purposes of' the	Allocation undeveloped but there is no indication that the site won't be delivered in the Local Plan period. The change in the general duty on public bodies in relation to AONBs (National Landscapes) is not thought to affect the principle of the existing allocation, and local and national planning policy already places a strong emphasis on protecting the AONB landscape.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	remains the statutory title).			AONB, amended from 'shall have regard to'.	The out-of-date reference to AONB is a minor change that whilst desirable is not considered necessary. Policy remains effective as part of the strategy to meet housing requirements.
WLP7.8 – Land North of Chapel Road, Wrentham	DC/21/2679/FUL permitted for 65 dwellings.	No.	None	None	Delivery of the site is ongoing and there is no indication that the site won't be delivered in the Local Plan period. Policy remains effective as part of the strategy to meet housing requirements.
WLP7.9 – Land South of Southwold Road, Brampton	None.	No.	None	None	Allocation undeveloped but with no indication that the site won't be delivered in the Local Plan period. Policy remains effective as part of the strategy to meet housing requirements.
WLP7.10 – Land at Toodley Farm, Station Road, Brampton	None.	No.	None	None	Allocation undeveloped but with no indication that the site won't be delivered in the Local Plan period. Policy remains effective as part of the strategy to meet housing requirements.
WLP7.11 – Land South of Hogg Lane, Ilketshall St Lawrence	DC/23/3045/FUL for 25 dwellings awaiting decision.	No.	None.	None.	Allocation undeveloped but with no indication that the site won't be delivered in the Local Plan period. Policy remains effective as part of the strategy to meet housing requirements.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
WLP7.12 – Land East of The Street, Lound	None.	No.	None	None	Allocation undeveloped but with no indication that the site won't be delivered in the Local Plan period. Policy remains effective as part of the strategy to meet housing requirements.
WLP7.13 – Land North of Chapel Road, Mutford	Policy refers to Suffolk Coast and Heaths Area of Outstanding Natural Beauty which is now known as National Landscapes (albeit AONB remains the statutory title). DC/20/3366/OUT permitted for 6 dwellings.	No.	None	The Levelling Up and Regeneration Act has amended the duty on public bodies in relation to AONBs requiring that bodies must seek to 'further the purposes of' the AONB, amended from 'shall have regard to'.	Site has planning permission and there is no indication that the site won't be delivered in the Local Plan period. The change in the general duty on public bodies in relation to AONBs is not thought to affect the principle of the existing allocation, and local and national planning policy already places a strong emphasis on protecting the AONB landscape. The out-of-date reference to AONB is a minor change that whilst desirable is not considered necessary. Policy remains effective as part of the strategy to meet housing requirements.
WLP7.14 – Land North of School Road, Ringsfield	DC/20/1001/OUT permitted for 33 dwellings.	APP/X3540/W/21 /3281602 appeal allowed.	None.	None.	Site has planning permission and there is no indication that the site won't be delivered in the Local Plan period. Policy remains effective as part of the strategy to meet housing requirements.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
WLP7.15 – Land East of Mill Road, Rumburgh	None.	No.	None.	None.	Allocation undeveloped but with no indication that the site won't be delivered in the Local Plan period. Policy remains effective as part of the strategy to meet housing requirements.
WLP7.16 – Land East of Woodfield Close, Willingham	None.	No.	None	None	Allocation undeveloped but with no indication that the site won't be delivered in the Local Plan period. Policy remains effective as part of the strategy to meet housing requirements.
WLP7.17 – Land West of Lock's Road, Westhall	DC/23/1913/FUL for 18 dwellings awaiting decision	No.	None	None	Allocation undeveloped but with no indication that the site won't be delivered in the Local Plan period. Policy remains effective as part of the strategy to meet housing requirements.
WLP8.1 – Housing Mix	New Strategic Plan 'Our Direction 2028' adopted by Council in November 2023. Includes the theme 'sustainable housing' which aims to deliver and support the	No.	The December 2023 NPPF includes specific reference to assessing needs for retirement housing, housing-with-care and care homes. Planning Practice Guidance on	None.	The policy is delivering a mix of housing based on assessed needs, including the delivery of smaller homes. Needs for sheltered, extra care and care homes were assessed through the Strategic Housing Market Assessment which underpins the Local Plan. The PPG on Housing for Older and Disabled People refers to 'Retirement living or sheltered housing' as one category and therefore the reference to 'retirement housing' in the NPPF is likely to be captured by the assessment of

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	right housing developments in the right locations based on all residents' housing needs.		Housing for Older and Disabled People was published in 2019 (after the Local Plan was adopted).		<p>sheltered needs. The strategic sites are expected to further contribute to the delivery of older persons housing.</p> <p>Some Neighbourhood Plans have also set out their own approach to housing type and mix, based on local evidence, as supported by the policy.</p> <p>Policy remains effective.</p>
WLP8.2 – Affordable Housing	<p>A relatively small number of viability cases demonstrating a relaxation of affordable housing percentages have been accepted, although the current (2023) market is becoming more challenging.</p> <p>The three different zones (20% Lowestoft; 40% Southwold and Reydon; and</p>	<p>Some affordable housing amounts have been challenged through applications/appeals, but this reflects the provisions in the policy for varying affordable housing in exceptional circumstances.</p> <p>Halesworth assisted living scheme appeal (APP/X3540/W/2</p>	<p>The WLP sets the threshold at 11 dwellings (based on the 2012 NPPF) but this was subsequently changed to 10 or more dwellings or 0.5ha or more in later NPPF iterations.</p> <p>First Homes were introduced in 2021 as a form of discounted market housing and the PPG expects that 25% of affordable</p>	None.	<p>An Affordable Housing SPD was adopted in 2022 which provides additional detail and guidance to support the implementation of the policy.</p> <p>26% of all dwellings completed between 2014-23 were affordable housing (554 of 2,156 new homes), demonstrating that affordable housing is being delivered under WLP 8.2. The figure of 26% relates to the proportion of <i>all</i> housing completions, which will include those on sites of 10 or fewer where affordable housing is not required by policy.</p> <p>The Affordable Housing SPD explains how the First Homes policy is applied under the existing WLP 8.2.</p> <p>A full viability appraisal would be needed for any Local Plan review, which would help determine</p>

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	<p>30% elsewhere) appear to be broadly appropriate still, and the CIL Charging Schedule viability work had them at different values (£0 per m², £300 per m² and £100 per m² respectively)</p> <p>New Strategic Plan 'Our Direction 2028' adopted by Council in November 2023. Includes the theme 'sustainable housing' which aims to deliver</p>	<p>2/3301868) (Land West Of Norwich Road Halesworth Suffolk) allowed with conditions – one of the contributing reasons that this appeal was allowed was due to the Inspector's consideration of what was meant by "Affordable housing provision will only be reduced on sites which are necessary to the overall supply of housing in the District unless the scheme has wider</p>	<p>housing secured as part of residential development is First Homes.</p> <p>A recent ministerial statement³ encourages flexibility in the consideration of the viability of existing permissions</p>		<p>future affordable housing thresholds and amounts.</p> <p>A recent ministerial statement encourages flexibility in the consideration of the viability of existing permissions, but the existing policy already allows for flexibility based on viability.</p> <p>The Broads Authority Local Plan defaults to Waveney Local Plan policy on affordable housing. The Broads Authority have endorsed the ESC Affordable Housing SPD.</p> <p>Whilst some updates to the policy would be desirable, these are not considered necessary.</p>

³ <https://questions-statements.parliament.uk/written-statements/detail/2023-12-19/hcws161>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	and support the right housing developments in the right locations based on all residents housing needs.	sustainability benefits”.			
WLP8.3 – Self Build and Custom Build	<p>New Strategic Plan ‘Our Direction 2028’ adopted by Council in November 2023. Includes the theme ‘encourage more self-build housing in East Suffolk’.</p> <p>Demand from the Self-Build Register has grown strongly each year. The register covers the whole of East Suffolk (former Waveney area and former</p>	<p>This policy in the Waveney Local Plan has not been tested at appeal, however there is a policy in the Suffolk Coastal Local Plan which is very similar which has been tested at appeal (APP/X3540/W/21/3276418) (Land west of PROW 21, Woods Lane, Melton). There were no issues found with the policy itself, but the Inspector gave ‘significant weight’ to the proposal meeting</p>	<p>December 23 NPPF includes reference to policies and decisions supporting opportunities for small sites for community led housing and custom and self-build housing.</p>	<p>Changes being introduced through the Levelling Up and Regeneration Act (section 123) are intended to tighten the criteria around what permissions can be counted towards meeting the demand.</p>	<p>The draft Custom and Self-Build Housing SPD which provides further guidance on implementing this policy went out for public consultation in September/ October 2023 and is due to be adopted in Spring 2024.</p> <p>The Self-build and Custom Housebuilding Act 2015 (as amended) places a legal duty on local planning authorities to grant enough planning permissions to meet the demand arising from the Register.</p> <p>Paragraph 63 of the NPPF states that, in establishing the need for housing, the size, type and tenure of housing should be assessed for different groups, including those wishing to build or commission their own homes. The PPG on self and custom build housing (paragraph 11) states that the custom and self-build register and evidence from secondary sources should be used in assessing demand.</p>

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	Suffolk Coastal area). ⁴	a shortfall in custom and self-build home provision. The appeal was however dismissed.			<p>The policy is providing a pipeline of plots as intended, but they are not coming through quickly enough to meet the rising demand.</p> <p>Although demand on the register has risen across East Suffolk, the Waveney Local Plan policy is not being tested or challenged at appeal. Since adoption of the Waveney Local Plan there has not been a significant number of applications for self and custom build housing.</p> <p>The Council continues to maintain the Self-Build register including adding and removing entries as required.</p> <p>As part of a future Local Plan review, consideration should be given to commissioning a custom and self-build demand assessment to bring together register data with other secondary data sources.</p> <p>Alongside WLP8.3 other policies in the plan continue to form part of the consideration of applications for custom and self-build developments (such as design, access, landscape</p>

⁴ <https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/self-build-and-custom-build/>

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					<p>impact etc) providing an effective policy framework for decision making.</p> <p>Whilst through a future Local Plan review, revisiting the policy approach may be desirable, updates are not considered necessary.</p>
WLP8.4 – Conversion of Properties to Flats	<p>There is an Article 4 Direction covering change of use to HMOs in the Waveney Local Plan area. A review is being considered, in line with revised NPPF policy on Article 4s which expects these to apply to the smallest geographical area possible. This may also assist with provision of appropriate, affordable accommodation for young adults.</p>	<p>APP/T3535/W/18/3208503 (189 Raglan Street, Lowestoft, Suffolk, NR32 2JX) dismissed. Main issue whether dwelling was suitable for HMO.</p> <p>APP/T3535/W/18/3214230 (36 Tennyson Road, Lowestoft, Suffolk, NR32 1PS) dismissed. Main issue whether dwelling was suitable for HMO.</p>	<p>None relating to the policy itself, although the NPPF was amended in 2021 in relation to Article 4 Directions (para 53 of Dec 2023 NPPF) explaining they should be evidenced, necessary and applied to the smallest geographical area possible.</p>	None.	<p>In applying the “exceptional circumstances” policy requirement there is no supporting text to indicate what potential “exceptional circumstances” might be and this might hinder the delivery of more HMOs, which are known to be needed (as cheap accommodation for low-wage employees or those on benefits). Explanation of “Exceptional Circumstances” could be provided through a guidance note.</p> <p>As part of a future local plan review consideration will be given to whether the flat saturation zones are still appropriate, whether the HMO criteria are still justified and, if ‘exceptional circumstances’ provisions are adequate.</p> <p>In the short term, the Article 4 Direction can be reviewed in line with NPPF policy. The need for a policy review will be determined partly by evidence obtained through reviewing the Article 4 Direction.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
					Whilst through a future Local Plan review revisiting the policy approach may be desirable, updates are not considered necessary.
WLP8.5 – Gypsy and Traveller Sites	DC/18/0102/COU Windy Acres, Mutfordwood Lane, Mutford, Lowestoft Change of Use of Land (retrospective) to provide four additional mobile homes for Gypsy/ Travellers, permitted 26/04/2018. (The needs identified in the Local Plan relate to the 2016 – 2036 period).	No.	Planning Policy for Travellers Sites was amended in December 2023, reverting to a definition of Gypsies and Travellers for planning purposes that includes those who have ceased travelling permanently on grounds of education, health or old age.	None.	<p>Any updated Local Plan would need to assess the needs for Gypsy and Traveller accommodation based upon the revised definition.</p> <p>The policy refers to the definition contained in the August 2015 Planning Policy for Traveller Sites – the revised 2023 definition would be a material consideration in decision making.</p> <p>A future assessment of needs for Gypsy and Traveller accommodation would need to consider the current definition, and the level of need going forward.</p> <p>Provision for short stay stopping sites is considered Suffolk wide.</p> <p>In the meantime, the policy provides an effective framework for decision making, to be applied alongside the definition in the revised Planning Policy for Travellers Sites. Amending the policy would be desirable but is not necessary.</p>
WLP8.6 – Affordable	New Strategic Plan ‘Our Direction 2028’	None.	Whilst there have been changes to the exception	None.	An Affordable Housing SPD was adopted in 2022 which provides additional detail and guidance to support the implementation of the policy.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
Housing in the Countryside	adopted by Council in November 2023. Includes the theme 'sustainable housing' which aims to deliver and support the right housing developments in the right locations based on all residents housing needs.		sites policies in national policy, including through the introduction of First Homes exception sites, the principles remain the same. Changes to the NPPF in December 2023 allow for development of community-led housing on sites which otherwise wouldn't be suitable as exception sites.		<p>The policy remains appropriate in light of national policy on affordable housing exception sites.</p> <p>In relation to community led affordable housing, whilst consideration would be given to addressing this specifically through a future policy review, policy in the NPPF would be applied as a material consideration in the meantime alongside other Local Plan policies such as in relation to accessibility and landscape.</p> <p>Amending the policy would be desirable but is not necessary</p>
WLP8.7 – Small Scale Residential Development in the Countryside	New Strategic Plan 'Our Direction 2028' adopted by Council in November 2023. Includes the theme 'sustainable housing' which aims to deliver	APP/X3540/W/21 /3286490 (Former White Willow Barn The Street, St James, Halesworth, South Elmham). Appeal dismissed. WLP 8.7 working effectively	None.	None.	<p>Supplementary Planning Document on Housing in Clusters and Small Scale Residential Development in the Countryside was adopted in 2022, which is assisting in the interpretation and implementation of the policy.</p> <p>Policy remains effective.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	and support the right housing developments in the right locations based on all residents housing needs.	<p>Appeal heard before the Housing in Clusters and Small Scale Residential Development in the Countryside SPD was adopted (Nov 2022).</p> <p>APP/X3540/W/19/3239124 (Land Adjacent Hall Cottage Church Road Henstead Suffolk NR34 7LD) Conditionally allowed appeal. Main issue was the impact on designated heritage assets and highway safety rather than the principle of this policy.</p>			

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
WLP8.8 – Rural Workers Dwellings in the Countryside	None.	APP/X3540/W/21/3281828 (Valley Farm Wash Lane Beccles)- Appeal following decision to refuse removal of agricultural workers conditions. Appeal dismissed. Whilst recognising the unique situation of the current occupant the Inspector found this did not outweigh the need for rural worker dwellings.	None.	None.	<p>The Rural Development SPD which will provide further guidance on implementing this policy is currently under preparation.</p> <p>Policy remains effective.</p>
WLP8.9 – Replacement Dwellings and Extensions in the Countryside	None.	APP/X3540/D/21/3285169 (Heath Farm Barn, London Road, Kessingland) – Appeal for an extension to a house in the countryside was allowed.	None.	None.	<p>Whilst an appeal was allowed it is considered that this relates to a matter of planning judgement on this case and the policy itself remains appropriate.</p> <p>Policy remains effective.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
		<p>Inspector concluded existing building was of limited architectural merit and the extension would be in character with existing dwelling. Noted that whilst the extension will increase the scale of dwelling this is offset by the distance/view from the public realm and its relationship to the surrounding buildings.</p>			
WLP8.10 – Residential Annexes in the Countryside	None.	APP/X3540/W/19/3236570 (Briar House Church Lane, Lound, Lowestoft) dismissed. Policy upheld – Inspector concluded a legal	None	None.	<p>The Rural Development SPD which will provide further guidance on this policy is currently under preparation.</p> <p>Policy remains effective.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
		agreement, while restricting to ancillary accommodation, would not overcome separate appearance of the annex.			
WLP8.11 – Conversion of Rural Buildings to Residential Use	None.	<p>APP/X3540/W/19/3232531 (Hill Farm Cottage, Englishes Lane, Ilketchall St John, Beccles) - allowed. Inspector felt policy was too restrictive compared to the NPPF (para 79c, now 84c), and therefore gave it 'limited weight'.</p> <p>APP/X3540/W/21/3281525 (Mariawood, Hulver Street, Henstead,</p>	None.	Government consultation on proposed changes to Permitted Development Rights took place in 2023. It included proposed changes to Permitted Development rights to convert agricultural buildings to residential use. Awaiting results of consultation.	<p>Whilst in one appeal the Inspector considered that the policy is more restrictive than the NPPF, the NPPF policy has not substantially changed since the 2012 NPPF (was para 55c, now para 84c) and therefore it is considered the policy remains as appropriate as when it was examined and adopted.</p> <p>The policy would still operate alongside any changes to Permitted Development rights as it would apply in those situations where planning permission is needed.</p> <p>The Rural development SPD which will provide further guidance on this policy is currently under preparation.</p> <p>Policy remains effective.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
		Beccles) – dismissed. WLP 8.11 working effectively.			
WLP8.12 – Existing Employment Areas	None. The policy doesn't provide protection for existing employment uses outside of the Existing Employment Areas.	No.	The following has been added to the NPPF in 2018 'and for storage and distribution operations at a variety of scales and in suitably accessible locations.' Planning Policies and decision should address specific locational requirements of different sectors. The specific reference to storage and distribution adds additional recognition to the role of storage and distribution. B8 uses are	B1 Use Class no longer exists and has become part of Use Class E(g) in the 2020 amendment to the Use Classes Order. A1 Use Class no longer exists and has become part of Use Class E(g) in the 2020 amendment to the Use Classes Order.	Changes to the Use Classes Order means that updating references to B1 and A1 uses in the policy would be desirable, but this change is not considered currently necessary as decisions can be taken with reference to the new Use Classes Order. Through a review, consideration would be given to introducing policy which protects employment uses outside of Existing Employment Areas. Amending the policy would be desirable but is not necessary

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
			however covered in the policy.		
WLP8.13 – New Employment Development	None.	No.	<p>The following has been added to the NPPF in 2018 ‘and for storage and distribution operations at a variety of scales and in Suitably accessible locations.’ Planning Policies and decisions should address specific locational requirements of different sectors. The specific reference to storage and distribution adds additional recognition to the role of storage and distribution. B8 uses are however covered in the policy.</p>	<p>B1 Use Class no longer exists and has become part of Use Class E(g) in the 2020 amendment to the Use Classes Order.</p> <p>A1 Use Class no longer exists and has become part of Use Class E(g) in the 2020 amendment to the Use Classes Order.</p>	<p>Changes to the Use Classes Order means that updating references to B1 and A1 uses in the policy would be desirable, but this change is not considered currently necessary as decisions can be taken with reference to the new Use Classes Order.</p> <p>Amending the policy would be desirable but is not necessary</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
WLP8.14 – Conversion and Replacement of Rural Buildings for Employment Use	None.	No.	In the 2018 revision a paragraph was added (now para 89) stating that policy should recognise that important rural employment may need to be beyond existing settlements and not well served by public transport before setting out a criteria for such development. The current policy is broadly in conformity with this paragraph.	B1 Use Class no longer exists and has become part of Use Class E(g) in the 2020 amendment to the Use Classes Order.	Changes to the Use Classes Order means that updating references to B1 and A1 uses in the policy would be desirable, but this change is not considered currently necessary as decisions can be taken with reference to the new Use Classes Order. Amending the policy would be desirable but is not necessary
WLP8.15 – New Self Catering Tourist Accommodation	None.	APP/X3540/W/19 /3237328 (31 Kessingland Cottages, Rider Haggard Lane, Kessingland) The appeal against a	None.	General Permitted Development Order has added Part 4 Class BC.	The Rural Development SPD which will provide further guidance on this policy is currently under preparation, and is anticipated to be adopted in Spring 2024. A future review of the plan may wish to extend the policy to include all tourism accommodation

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
		<p>refusal of 16 self-catered holiday units determined that policy WLP8.15 should only be applied to new tourism accommodation and not used to govern existing holiday accommodation and related conditions that restrict its use.</p> <p>This appeal decision is further supported by APP/X3540/D/21/3275974 (Pakefield Caravan Park, Arbor Lane, Lowestoft)</p>			<p>not just 'new' accommodation to enhance protection of holiday uses important to the local economy.</p> <p>Policy remains effective.</p>
WLP8.16 – New Hotels and Guest Houses	None.	No.	None.	None.	<p>No change required.</p> <p>Policy remains effective.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
WLP8.17 – Existing Tourist Accommodation	None.	APP/T3535/W/19 /3224869 (Part Land North of Alandale Drive, Kessingland)-dismissed. The policy was tested at this appeal and the inspector upheld its use.	None.	None.	No change required. Policy remains effective.
WLP8.18 – New Town Centre Use Development	None. Although retail will probably continue to play an important part in town centres in the future, it is unlikely to dominate as it has in the past.	No.	Whilst specific wording has changed, the NPPF paragraph 90 b) still requires local plans to define the extent of town centres and primary shopping areas, and still promotes the sequential approach to new town centre development i.e. to be located in town centres, then edge of centres and only	Changes to Permitted Development (retail to residential and office to residential) new use class E. This includes converting both retail and office uses to residential. Use Class E also includes industrial processes and offices. These are not normally considered	Key areas of the policy remain appropriate including the sequential approach and impact assessment. Changes to the Use Classes Order means that updating references to use classes in the policy would be desirable, but this change is not considered currently necessary as decisions can be taken with reference to the new Use Classes Order.. A future review of the Local Plan would consider the appropriateness of the location of town centre boundaries and the approach to new uses within them. -. Whilst through a future Local Plan review revisiting the policy approach may be desirable, updates are not considered necessary.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
			out of centre if not suitable sites available. The policy defines primary shopping areas. Paragraph 90c) also states that local plans should retain and enhance existing markets and create new ones where appropriate. This is a new addition to the NPPF.	consistent with town centres	
WLP8.19 – Vitality and Viability of Town Centres	In Lowestoft, town centre vacancy rates have risen from 21% of units in 2020, to 23.9% of units in 2022. In Bungay, the town centre vacancy rate rose from 17% to 19.1% over the same period. Rates have therefore	No.	The policies map defines primary and secondary frontages and the policy explains the extent to which non-retail development will be acceptable in each. Paragraph 90c) of the NPPF also states that local plans should protect the role	New Use Class E. Introduction of PD (class MA) rights for class E to residential. This includes converting both retail and office uses to residential. Use Class E also includes industrial processes and	<p>A future review of the Local Plan would consider the appropriateness of the policy approach towards the primary and secondary shopping frontages.</p> <p>Any future approach would be informed by a review of retail evidence.</p> <p>Changes to the Use Classes Order means that updating references to B1 uses in the policy would be desirable, but this change is not considered currently necessary as decisions can</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	<p>remained high during this period. Although retail will probably continue to play an important part in town centres in the future, it is unlikely to dominate as it has in the past.</p>		<p>of existing markets and create new ones. This is a new addition to the NPPF.</p>	<p>offices. These are not normally considered consistent with town centres.</p>	<p>be taken with reference to the new Use Classes Order. Whilst through a future Local Plan review revisiting the policy approach may be desirable, updates are not considered necessary.</p>
WLP8.20 – Local Shopping Centres	<p>Local centres appear to be generally functioning quite well, and the number of vacancies in Local Shopping Centres has remained relatively low in the period since the plan was drafted.</p>	None.	<p>The policy is consistent with NPPF paragraph 86 a), which requires local plans to define a hierarchy of service centres.</p>	<p>New use class E. Introduction of Permitted Development (Class MA) rights for class E to residential. This includes converting both retail and office uses to residential. Use Class E also includes industrial processes and offices. These are not normally</p>	<p>Future iterations of the policy will need to take account of Permitted Development and Use Classes changes.</p> <p>Any future approach to local shopping centres would be informed by a review of retail evidence.</p> <p>Amending the policy would be desirable but is not necessary</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
				considered consistent with local centres.	
WLP8.21 – Sustainable Transport	<p>New Strategic Plan ‘Our Direction 2028’ adopted by Council in November 2023. This contains the theme ‘environmental impact’ which includes ‘supporting sustainable transport’.</p> <p>The East Suffolk Cycling & Walking Strategy was adopted in 2022, which superseded the Waveney Cycle Strategy (2016).</p> <p>Suffolk County Council’s Suffolk Design: Streets</p>	APP/T3535/W/19 /3220502 – limited weight given to cycling and walking routes, only really considering the policy requirement to reduce conflict between users in the context of appropriate approaches to car parking.	Publication of Department for Transport’s ‘Gear Change’ policy document and technical guidance, Cycle Infrastructure Design: Local Transport Note 1/20 (‘LTN 1/20’) in July 2020.	None.	<p>This policy does not expressly refer to the adopted East Suffolk Cycling and Walking Strategy (2022), however, as it superseded the Waveney Cycle Strategy (2016), and the policy includes the wording ‘2016 and subsequent updates’, this is effectively covered by the current policy wording.</p> <p>This policy does not expressly refer to the Department for Transport’s Cycle Infrastructure Design: Local Transport Note 1/20 (‘LTN 1/20’, 2020), as this was published after the WLP was adopted. However, wording of this policy is sufficiently high level that not having an explicit reference to LTN 1/20 does not undermine the policy’s overall aims.</p> <p>This policy includes reference to Suffolk County Council’s Guidance for Parking document ‘2014 and subsequent updates’; this wording therefore provides for subsequent updates to the document and does not need to be updated.</p> <p>Whilst the updates above would be desirable, they are not considered to be necessary.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	<p>Guide was adopted in 2022.</p> <p>Suffolk Guidance for Parking was updated in October 2023.</p>				
WLP8.22 – Built Community Services and Facilities	None.	<p>No. However, it is acknowledged that the equivalent policy in the Suffolk Coastal Local Plan has been tested on appeal- APP/X3540/W/21/3267667 (Admirals Head Inn Sandy Lane Little Bealings). This concerned an application to convert a public house, which is designated as an asset of community value, to residential use.</p>	None.	None.	<p>The policy states that community facilities designated as an Asset of Community Value (ACV) cannot be converted to non-community uses. The intention of the policy was to mitigate against inflated values which could frustrate a community’s ability to bid for a property, however there is a risk that in certain circumstances it could lead to long term empty properties. There is considered to be sufficient flexibility when taking into account other material considerations to allow for such circumstances if this became needed. Whilst updates would be desirable, they are not considered to be necessary.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
		<p>The inspector concluded that the public house had been vacant for several years, despite efforts to market the business, and that there was no prospect of it being used as a public house in the future. Therefore, the appeal was allowed and conversion to non-community use was permitted.</p>			
WLP8.23 – Protection of Open Space	None.	No.	None, still in close alignment with para 103 of NPPF.	None.	Policy remains effective.
WLP8.24 – Flood Risk	None.	APP/X3540/W/19/3242698 (Land Rear of 21 Birds Lane Lowestoft) – Appeal dismissed in part on flood	None.	None.	The Strategic Flood Risk Assessment was finalised in April 2018, and the underlying data is older. Updated climate change data will need to inform an updated SFRA in identifying flood risk areas as part of a Local Plan review in due course.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
		risk grounds, resulting from failure to appropriately apply the sequential test. Inspector noted WLP8.24 is consistent with national policy.			<p>The Council works with a number of relevant organisations in managing development and flood risk in accordance with the Town and Country Planning (Development Management Procedure) (England) Order 2015, including the Environment Agency (EA) and Suffolk County Council as the Lead Local Flood Authority (LLFA). The EA, as the responsible body for the strategic overview of flood risk management, plays a central role in delivering the flood risk priorities of the Government and managing flood risk from rivers and the sea. The LLFA has the lead operational role in managing the risk of flooding from surface water, ground water, and ordinary watercourses. The Council engages the LLFA on relevant planning applications where flood risk is a material consideration.</p> <p>The Council’s Strategic Flood Risk Assessment, and the Environment Agency’s national flood risk map provide useful data in understanding flood risk across East Suffolk. To complement this data, site specific flood risk assessments need to be submitted alongside relevant planning applications.</p> <p>Policy remains effective.</p>
WLP8.25 – Coastal Change	New Strategic Plan ‘Our Direction 2028’	No.	None.	None.	A Coastal Adaptation SPD was adopted in 2023 which provides additional detail and guidance to support the implementation of the policy.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
Management Area	adopted by Council in November 2023. This contains the theme 'Environmental Impact which includes working 'in partnership to manage coastal adaption and create resilience'.				<p>The policy is consistent with national policy and development plan policy across those authorities that prepared the joint Coastal Adaptation SPD. However, the underlying data on which the CCMA is based, as set out in the Shoreline Management Plan (SMP), would benefit from being updated; The short-term risk zone (i.e. changes to the coast expected within 20 years) is identified within SMP7 (Lowestoft to Felixstowe) as ending in 2025. However, this change is not considered to necessitate review of the policy and is not directly within the control of the Council anyway, as SMPs are prepared on a partnership basis by a number of bodies.</p> <p>Policy remains effective.</p>
WLP8.26 – Relocation and Replacement of Development Affected by Coastal Erosion	New Strategic Plan 'Our Direction 2028' adopted by Council in November 2023. The Council will work in partnership with stakeholders and communities to manage coastal adaption and	No.	None.	None.	<p>A Coastal Adaptation SPD was adopted in 2023 which provides additional detail and guidance to support the implementation of the policy.</p> <p>It is recognised that issues of the relocation of properties along the coast presents significant challenges.</p> <p>It is expected that outcomes from the Resilient Coasts project will inform future Local Plan policies.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	<p>create resilience wherever possible.</p> <p>East Suffolk Council, through Coastal Partnership East, are taking forward the Resilient Coasts project⁵ which will work alongside communities to create and pilot a practical Coastal Adaptation Toolkit.</p>				<p>In the interim, the policy continues to provide an effective policy framework for decision making.</p>
WLP8.27 – Renewable and Low Carbon Energy	New Strategic Plan ‘Our Direction 2028’ adopted by Council in November 2023.	No.	The 2023 NPPF allows Supplementary Planning Documents, as well as	A consultation was held in 2023 on Permitted development rights for solar equipment on	<p>No changes are currently required to the policy.</p> <p>Whilst the Council seeks to support green energy technologies through its new Strategic Plan, the more restrictive approach to wind energy</p>

⁵ [Resilient Coasts - Great Yarmouth and East Suffolk | Engage Environment Agency \(engagementhq.com\)](https://www.engagementhq.com)

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	<p>The Council is committed to supporting, promoting and implementing green technologies to create energy across the district, contributing to local and national energy infrastructures.</p>		<p>development plans, to identify areas as suitable for wind energy development.</p> <p>The NPPF states that significant weight should be given to the need to support energy efficiency and low carbon heating improvements to existing buildings.</p>	<p>and within the curtilage of domestic and non-domestic buildings. Awaiting the results of the consultation.</p>	<p>development remains reflective of the current policy in the NPPF.</p> <p>Policy remains effective.</p>
WLP8.28 – Sustainable Construction	<p>New Strategic Plan ‘Our Direction 2028’ adopted by Council in November 2023. This includes the theme ‘environmental impact’ which aims to deliver positive climate, nature and environmental impacts. Through</p>	No.	<p>There has been no recent Government advice (PPG) or meaningful changes to the NPPF. The Ministerial Statement issued on 13th December</p>	<p>There have been updates to Approved Document Part L (Conservation of fuel and power) of the Building Regulations which impacts sustainable construction. This policy does not set standards higher than</p>	<p>The Council is committed to delivering sustainable housing and supporting, promoting and implementing green technologies.</p> <p>A Sustainable Construction SPD was adopted in 2022 which provides additional detail and guidance to support the implementation of this policy.</p> <p>Whilst the Council may wish to go further, under current national policy and guidance the policy remains appropriate and is not technically out of date. There is no planning policy reason to change the policy.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	<p>this the Council is committed to supporting, promoting and implementing green technologies to create energy across the district, contributing to local and national energy infrastructures.</p> <p>A key ambition is the delivery of sustainable housing through tackling fuel poverty and supporting new heating</p>		<p>2023⁶ set out that the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned building regulations. Any planning policies must have a well-reasoned and robustly costed rationale with detailed requirements set out in the ministerial statement.</p>	<p>Building Regulations. The Building Regulations updates have therefore not impacted the implementation of the policy.</p>	<p>Whilst updates would be desirable, they are not considered to be necessary</p>

⁶ <https://questions-statements.parliament.uk/written-statements/detail/2023-12-13/hcws123#:~:text=Statement%20made%20on%2013%20December%202023&text=As%20a%20Government%2C%20we%20continue,the%20homes%20and%20building%20sector.>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	technologies, and promoting developments which enhance wellbeing and protect the environment.				
WLP8.29 – Design	Suffolk Design – Streets Guide adopted by Suffolk County Council in 2022.	The policy has been successfully used across a number of appeals, the majority of which focus on the design impacts of development proposals on the character of the area, and/or the amenity impacts on existing nearby occupants and future occupants.	<p>Building for Life 12 has been superseded by Building for a Healthy Life, and other resources have also been introduced (e.g. National Design Guide and National Model Design Code).</p> <p>The 2023 NPPF states that local design codes should be the primary means of assessing and improving the design of development.</p>	The Levelling Up and Regeneration Act 2023 (LURA) will require local authorities to set out design requirements within a development plan document that relate to the whole local authority area.	<p>East Suffolk Council does not currently have a design code but, reflecting the new requirement introduced by the LURA, is considering how best to progress this for the district. It is anticipated that further guidance will be provided by the Government alongside the commencement of this part of the LURA. The design code would in time inform future design policy.</p> <p>Amending the policy would be desirable but is not necessary</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
			Since the adoption of the Local Plan, the Government has published the National Design Guide and National Model Design Code, both of which provide design guidance which can be applied at the local level.		
WLP8.30 – Design of Open Spaces	None.	No.	Since the adoption of the Local Plan, the Government has published the National Design Guide and National Model Design Code, both of which provide design guidance which can be applied at the local level.	None.	<p>No changes identified.</p> <p>The Healthy Environments SPD which will provide further guidance on implementing this policy, is currently under preparation.</p> <p>Policy remains effective.</p>
WLP8.31 – Lifetime Design	None.	No.	Since the adoption of the	M4(2) is set to become the new	No changes identified.

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			Local Plan, the Government has published the National Design Guide and National Model Design Code, both of which provide design guidance which can be applied at the local level.	minimum Building Regulation standard for dwellings, though this change has not yet come into force.	The Healthy Environments SPD which will provide further guidance on implementing this policy, is currently under preparation. Policy remains effective.
WLP8.32 – Housing Density and Design	None.	APP/T3535/W/18/3212605 (69 Beccles Road, Bungay) – Appeal relating to residential development and local character and distinctiveness was dismissed. There is an element of policy duplication with policy WLP8.29 in respect of protecting or enhancing local	Since the adoption of the Local Plan, the Government has published the National Design Guide and National Model Design Code, both of which provide design guidance which can be applied at the local level.	None.	No changes needed. Policy remains effective.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
		character, appearance and distinctiveness.			
WLP8.33 – Residential Gardens and Urban Infilling	None.	A number of appeals relate to the application of this policy, the vast majority of which have been dismissed due to adverse impacts of the development on the character and appearance of the area.	None.	None.	No changes needed. Policy remains effective.
WLP8.34 – Biodiversity and Geodiversity	The Recreational disturbance Avoidance and Mitigation Scheme SPD (referenced in the text) has now been adopted. New Strategic Plan 'Our Direction 2028' adopted by Council in	No issues relating to this policy were found as part of the appeals process. One appeal decision raised issues with the mechanisms the Council are using to secure RAMS payments to mitigate impacts	None.	The Environment Act 2021 brings in mandatory Biodiversity Net Gain from Jan 2024.	The policy does not refer to biodiversity net gain specifically but is sufficiently flexible to not impede the implementation of BNG requirements. Amending the policy would be desirable but is not necessary.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	November 2023. Includes the theme 'environmental impact' which aims to deliver positive climate, nature and environmental impacts.	on Habitat Sites, but this does not undermine the policy intent or wording, and hasn't been an issue in most appeal decisions.			
WLP8.35 – Landscape Character	The policy refers to Suffolk Coast and Heaths Area of Outstanding Natural Beauty which is now known as National Landscapes (albeit AONB remains the statutory title).	No.	Addition of reference to the scale and extent of development in AONBs (NLs) to be limited, and development in the setting to be sensitively located and designed.	The Levelling Up and Regeneration Act (LURA) has amended the statutory role of local authorities to 'further the purpose' of AONBs/ National Landscapes and the Broads, in place of 'to have regard' to them.	<p>The out-of-date reference to AONB is a minor change that is not considered to warrant review of the policy.</p> <p>Amendments to the NPPF to refer to considering impact from development in the setting is already reflected in the policy.</p> <p>Whilst the policy doesn't refer to development of a limited scale and extent, it contains strong policy on protection of the landscape and scenic beauty, and the NPPF would also be a material consideration in the determination of planning applications against this policy.</p> <p>This revised duty under the LURA to 'further the purpose' of AONBs/National Landscapes and the Broads can be applied under the policy framework provided by WLP8.35.</p>

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
					Amending the policy would be desirable but is not necessary.
WLP8.36 – Coalescence of Settlements	None.	No.	None.	None.	No necessary changes. Policy remains effective.
WLP8.37 – Historic Environment	None.	No issues of policy interpretation. Appeal decisions in relation to this policy relate to judgements as to whether or not (and the extent to which) development would harm the significance of heritage assets.	None.	No issues of consistency with relevant legislation (e.g. Planning (Listed Buildings and Conservation Areas) Act 1990).	A Historic Environment SPD was adopted in 2021 which provides additional detail and guidance to support the implementation of the policy. This replaced the Heritage and Design SPD referenced in the policy. The Planning (Listed Buildings and Conservation Areas) Act 1990 refers to ‘preserve and/or enhance’ while the policy uses ‘protect and enhance’ and ‘conserve or enhance’. It would be more consistent to use the same wording as the Planning (Listed Buildings and Conservation Areas) Act 1990. The need to update these references does not impact the application of the policy. Amending the policy would be desirable but is not necessary.
WLP8.38 – Non-Designated Heritage Assets	East Suffolk Council does not maintain a local list of NDHAs, however a local list of parks and	No.	None.	No issues of consistency with relevant legislation (e.g. Planning (Listed Buildings and	There are two matters identified in the policy, as detailed in the second column of this matrix. These are however minor, which do not impact the application of the policy and are not considered to warrant review of the policy.

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
	<p>gardens was extended in 2022 to include five historic parklands in the Waveney Local Plan area.</p> <p>The supporting text, below paragraph 8.221, includes reference to the NDHA assessment criteria, which includes reference to 'artistic value' under the 'artistic interest' criterion. This is slightly different to the updated NDHA criteria, which refers to 'aesthetic value'.</p>			Conservation Areas) Act 1990).	<p>Reference to the locally listed parks and gardens would provide clarity in the policy approach for these areas. In the meantime, national policy in paragraph 209 of the NPPF will apply to proposals.</p> <p>Amending the policy would be desirable but is not necessary.</p>
WLP8.39 – Conservation Areas	None.	No.	The NPPF was amended in 2021 in relation to Article 4	None.	No changes needed. The policy is considered to be consistent with the NPPF (para 53 – Article 4 directions), PPG and other relevant legislation (e.g. Planning (Listed Buildings and Conservation

Section/Policy	Any changes in circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Conclusion: Are any changes necessary?
			Directions (para 53 of Dec 2023 NPPF) explaining they should be evidenced, necessary and applied to the smallest geographical area possible.		Areas) Act 1990). A review of Article 4 Directions in the Waveney Local Plan area is underway. Policy remains effective.
WLP8.40 – Archaeology	None.	No.	None.	None.	No changes needed. Policy remains effective.

Appendix B – Housing need calculated under the Standard Method

The table below sets out the calculation of local housing need using the standard methodology as set out in the [Planning Practice Guidance on housing and economic needs assessments](#)⁷.

The calculation set out in the Planning Practice Guidance is as follows:

Step 1 - Set the baseline – use the 2014-based household projections⁸ and calculate the average annual household growth over a ten year period

Step 2 – Adjustment to take account of affordability – use the median workplace-based affordability ratios published by the ONS, using the formula below

$$\text{Adjustment factor} = \left(\frac{\text{Local affordability ratio} - 4}{4} \right) \times 0.25 + 1$$

Step 3 – Cap the level of any increase – capped at 40% above whichever is the higher of a) the projected household growth over the 10 year period or b) the annual housing requirement set out in the most recently adopted plan.

Step 4 – cities and urban centres uplift – not relevant to the Waveney Local Plan area.

Date	Households (base year)	Households (ten years time)	Total	Annual Average	Affordability ratio	Housing Need
1.4.2019	52,786	55,810	3,024	302.4	7.49 ⁹	368

⁷ <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

⁸ <https://www.gov.uk/government/statistical-data-sets/live-tables-on-household-projections>

⁹ <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian/current>
(superseded 19 March 2020)

1.4.2020	53,084	56,121	3,037	303.7	7.04 ¹⁰	361
1.4.2021	53,371	56,443	3,072	307.2	7.47 ¹¹	374
1.4.2022	53,661	56,764	3,103	310.3	7.98 ¹²	387
1.4.2023	53,954	57,089	3,135	313.5	7.79 ¹³	388
1.2.2024 ¹⁴	54,257	57,396	3,139	313.9	7.79 ¹⁵	388

¹⁰ Unable to locate affordability dataset online now – however housing need figure of 361 matches the indicative housing figure published by Government in December 2020 https://www.google.co.uk/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKEwjj-MTakKaEaxWhQkEAHSN4C-IQFnoECBQQAQ&url=https%3A%2F%2Fassets.publishing.service.gov.uk%2Fmedia%2F5fda008a8fa8f54d6480f591%2Findicative_Local_Housing_Need_Publication_Table_.ods&usg=AOvVaw1wv2shdOQCG3vnN7Amoww1&cshid=1707752240889507&opi=89978449

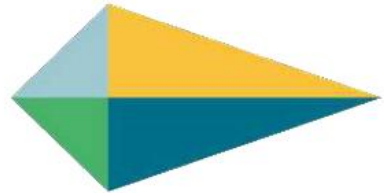
¹¹ <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/adhocs/13107housepricetoworkplacebasedearningsratioforformerlocalauthorities2019to2020>

¹² [Ratio of house price to workplace-based earnings for former local authorities - Office for National Statistics \(ons.gov.uk\)](#) ('2021 Edition of dataset')

¹³ [Ratio of house price to workplace-based earnings for former local authorities - Office for National Statistics \(ons.gov.uk\)](#) ('2022 Edition of dataset')

¹⁴ The figure for 2024 is as at 1st February 2024, based on data currently available for the 'current year'.

¹⁵ [Ratio of house price to workplace-based earnings for former local authorities - Office for National Statistics \(ons.gov.uk\)](#) ('2022 Edition of dataset'). Affordability Ratio based on the most recently published ONS dataset. The next dataset is not expected to be published until the end of March 2024.



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